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Of Attorneys for Defendant Metropolitan
Property and Casualty Insurance Company

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

LUCILLE BECK, an individual,)	Case No. 3:13-cv-00879-AC
)	
Plaintiff,)	
)	DECLARATION OF DANIEL E. THENELL
v.)	IN SUPPORT OF DEFENDANT'S
)	RESPONSE IN OPPOSITION TO
METROPOLITAN PROPERTY AND)	PLAINTIFF'S MOTION FOR ATTORNEY
CASUALTY INSURANCE COMPANY, a)	FEES AND COSTS
corporation,)	
)	
Defendant.)	
)	

I, Daniel E. Thenell, declare the following:

1. I am an attorney licensed to practice law in the states of Idaho, Oregon, Washington, and Alaska. I began the practice of law as a law clerk in the United State District Court for the District of Oregon in 1996. I was a Deputy District Attorney in Washington

County, Oregon, from 1999 to 2005. Since 2005 I have been in private practice in Portland, Oregon. The majority of my practice involves insurance coverage litigation in Oregon, Idaho and Washington. I am the managing shareholder of Thenell Law Group, P.C., and am the attorney of record in the above captioned action for Defendant Metropolitan Property and Casualty Insurance Company, hereinafter “Defendant”.

2. Attached hereto as Exhibit A is a true and accurate copy of the pertinent pages, highlighted for the Court’s convenience, of the transcript for the hearing held on August 15, 2014.

3. The following table contains true and accurate excerpts of the specific billing entries from Plaintiff’s submissions in her Motion for Attorney Fees which involve intra-office conferences between attorneys and/or multiple attorneys billing for the same tasks:

Date	Timekeeper	Description	Hours	Rate	Amount
1/11/12	CHG	Review e-mail from and telephone conference with Mrs. Beck concerning next steps with regard to fire claim. Confer with Attorney Reilly concerning same.	0.40	\$375.00	\$150.00
1/13/12	ATR	Conference with Attorney Greenwood regarding needs and assignment. Review e-mails concerning client questions and legal needs.	0.70	\$310.00	\$217.00
1/16/12	CHG	Confer with Attorney Reilly on meeting with insurer for later this week.	0.50	\$375.00	\$187.50
2/29/12	ATR	Review status of claim and confer with Attorney Greenwood regarding same. Review insurance policy to confirm payments and coverage owed.	0.90	\$310.00	\$279.00
3/9/12	CHG	Confer with Attorney Reilly on status of Mr. Shook’s work.	0.20	\$375.00	\$75.00
5/23/12	ATR	Review policy to firm up understanding of certain provisions therein. Confer with Attorney Greenwood regarding status.	0.80	\$310.00	\$248.00
5/29/12	ATR	Telephone conferences with Mrs. Beck and Attorney Greenwood regarding settlement strategy and scheduling meeting to cover same.	0.40	\$310.00	\$124.00
6/22/12	CHG	Confer with Attorney Reilly on scope issues.	0.30	\$375.00	\$112.50
6/29/12	CHG	Confer with Attorney Reilly on scope issues and how to move to finality.	0.70	\$375.00	\$262.50
7/3/12	ATR	E-mails with Attorney Greenwood and Mr. Shook regarding meeting to discuss remaining scope issues.	0.40	\$310.00	\$124.00
7/17/12	CHG	Review prior scopes. Instruct Legal Assistant Fleskes to prepare comparative analysis for use in settlement discussions.	0.50	\$375.00	\$187.50
8/24/12	CHG	Confer with Attorney Reilly on Mr. Funk’s visit and need to set objectives to be achieved. Analysis of how best to proceed.	0.60	\$375.00	\$225.00
8/27/12	CHG	Telephone conference with Mr. Shook concerning upcoming meeting. Confer with Attorney Reilly concerning same.	1.10	\$375.00	\$412.50
8/30/12	CHG	Confer with Attorney Reilly on code exclusion issues.	0.60	\$375.00	\$225.00

Date	Timekeeper	Description	Hours	Rate	Amount
9/11/12	ATR	Review revised scope from Partners, Inc. Conference with Attorney Greenwood regarding revised scope and plans for addressing same.	0.50	\$310.00	\$155.00
10/18/12	ATR	Review September 21 MetLife proposal and confer with Attorney Greenwood regarding strategy and next steps.	0.40	\$310.00	\$124.00
10/22/12	ATR	Confer with Attorney Greenwood regarding status of negotiations with MetLife and strategy for pursuing settlement. Follow-up e-mail to Attorney Greenwood regarding same.	0.80	\$310.00	\$248.00
10/24/12	ATR	Confer with Attorney Greenwood regarding status, strategy, and plans for trying to resolve remaining claims as favorably as possible.	0.30	\$310.00	\$93.00
10/26/12	ATR	Review policy for provisions for demanding payment and triggers that might follow such. Confer with Attorney Greenwood regarding same.	0.55	\$310.00	\$170.50
11/12/12	ATR	Confer with Attorney Greenwood regarding possible alternative experts to verify accuracy and/or identify problems with existing scope and bid.	0.80	\$310.00	
1/11/13	ATR	Review e-mail regarding input on Attorney Greenwood's settlement proposal. E-mail to Attorney Greenwood with feedback on same.	0.70	\$315.00	
1/14/13	ATR	Review draft e-mail from Attorney Greenwood for accuracy and additional input. Confer with Attorney Greenwood regarding same and planned further activity.	0.55	\$315.00	
1/16/13	ATR	Review revised settlement letter to Mr. Funk and confer with Attorney Greenwood regarding same and strategy going forward.	0.30	\$315.00	
1/29/13	CHG	Check status. Confirm MetLife has not contacted Attorney Reilly regarding Mrs. Beck's settlement offer.	0.10	\$385.00	
2/4/13	ATR	Confer with Attorney Greenwood regarding strategy going forward.	0.70	\$315.00	
2/6/13	CHG	Review status and analyze how to proceed. Review Oregon statute on lack of good faith settlement by insurer and consequences. Confer with Attorney Reilly on same. Telephone conference with Mrs. Beck. Draft letter to Mrs. Beck.	1.90	\$385.00	
2/7/13	ATR	Review and revise letter to Mrs. Beck prepared by Attorney Greenwood.	0.80	\$315.00	
2/7/13	ATR	Confer with Attorney Greenwood regarding strategy going forward.	0.60	\$315.00	
2/15/13	CHG	Revise and finalize letter to Attorney Thenell on moving forward with the restoration construction. Confer with Attorney Reilly on same. Prepare e-mail to Mrs. Beck on same.	1.60	\$385.00	
2/19/13	ATR	Review e-mail to Attorney Greenwood concerning next steps in claims process. Confer with Attorney Greenwood regarding feedback and potential response.	0.60	\$315.00	
2/20/13	ATR	Review correspondence from Attorney Thenell and confer with Attorney Greenwood regarding same. Review and revise correspondence to Attorney Thenell drafted by Attorney Greenwood. Confer with Attorney Greenwood over strategy going forward.	0.60	\$315.00	
2/27/13	ATR	Review correspondence and e-mails from Attorney Greenwood to Attorney Thenell. Review response e-mail from Attorney Thenell and confer with Attorney Greenwood regarding same.	0.50	\$315.00	\$157.50
2/28/13	CHG	Confer with Attorney Reilly on coverage issues.	1.20	\$385.00	\$462.00
4/9/13	ATR	Review Mr. Eggert's report. E-mail to Attorney Greenwood concerning same.	0.65	\$315.00	\$204.75
4/18/13	AAW	Meet and confer with Attorney Greenwood regarding results of legal research into "like kind and quality" language found in insurance policy.	0.35	\$190.00	\$66.50

Date	Timekeeper	Description	Hours	Rate	Amount
4/19/13	ATR	Participate in extended conference call with Mr. Eggert, Mrs. Beck, and Attorney Greenwood to discuss issues with scope and areas for potential challenges with same.	0.80	\$315.00	\$252.00
4/22/13	CHG	Prepare memorandum to file on Mr. Eggert's report and lengthy telephone conference with Mr. Eggert on April 19. Confer with Attorney Wheatley on researching like kind and quality versus equivalency.	1.50	\$385.00	\$577.50
4/23/13	AAW	Conduct legal research regarding the different interpretations given to policy terms requiring replacement with equivalent materials versus like kind and quality materials. Draft e-mail to Attorney Greenwood detailing the results of legal research on this issue.	3.40	\$190.00	\$646.00
4/23/13	CHG	Review and respond to e-mails from Mr. Eggert. Review e-mail from Attorney Wheatley on Oregon cases on like kind and quality. Request Attorney Reilly provide coverage language on loss above declared value. Review e-mail from Attorney Reilly and confirm Coverage A Plus language applies. Outline issues to cover in demand letter.	3.25	\$385.00	\$1,251.25
5/3/13	CHG	Review draft demand letter and enclosures. Prepare final revisions. Confer with Attorney Reilly concerning same. Telephone conference with Mrs. Beck to inform her of the status. Finalize letter and send to Attorney Thenell.	2.60	\$385.00	\$1,001.00
5/10/13	CHG	Confer with Attorney Reilly on whether to call Attorney Thenell's office. Instruct Attorney Reilly to call Attorney Thenell on Monday to check status.	0.20	\$385.00	\$77.00
5/13/13	ATR	Review e-mail from Attorney Thenell regarding receipt and contemplated review of Mr. Eggert's report and responses to Attorney Greenwood's May 6th letter.	0.40	\$315.00	\$126.00
5/13/13	ATR	Consider response and confer with Attorney Greenwood regarding same.	0.60	\$315.00	\$189.00
5/13/13	ATR	Review e-mail from Attorney Greenwood to Mrs. Beck and confer with Attorney Greenwood regarding same.	0.10	\$315.00	\$31.50
5/13/13	ATR	Review and respond to e-mail from Attorney Greenwood regarding loss of use issues and payments to date.	0.20	\$315.00	\$63.00
5/15/13	ATR	Review policy provisions and correspondence from Attorney Thenell, Attorney Greenwood, and Mr. Funk regarding ongoing negotiations and status of claim.	0.70	\$315.00	\$220.50
5/16/13	CHG	Review e-mail from Attorney Reilly. Listen to voicemail message from Mrs. Beck and return call to discuss status.	0.75	\$385.00	\$288.75
5/28/13	TL	Telephone conference with clerk at the United States District Court regarding delay in issuance of notice of case assignment and scheduling order. Learn that case administrator was on vacation and pleadings should be issued tomorrow. Update Attorney Reilly.	0.20	\$125.00	\$25.00
5/28/13	ATR	Review rules on service requirements and plan related activity. Confer with Paralegal Labrum regarding same.	0.90	\$315.00	\$283.50
6/24/13	CHG	Telephone conference with Attorney Reilly to discuss Metropolitan's failure to file an Answer. Authorize seeking default.	0.20	\$385.00	\$77.00
8/21/13	ATR	Confer with Attorney Greenwood regarding activity and planned next steps.	0.10	\$315.00	\$31.50
9/24/13	ATR	Confer with Attorney Greenwood regarding next steps and activity prior to settlement conference.	0.30	\$315.00	\$94.50
10/10/13	CHG	Telephone conference with Mrs. Beck on status and settlement position. Prepare e-mail to Attorney Reilly concerning same.	0.15	\$385.00	\$57.75
10/14/13	CHG	Confer with Attorney Reilly on need to prepare spreadsheet analysis for use at judicial settlement conference.	0.70	\$385.00	\$269.50
10/15/13	AAW	Interoffice conference with Attorneys Reilly and Greenwood regarding valuation issues.	0.20	\$190.00	\$38.00

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Date	Timekeeper	Description	Hours	Rate	Amount
10/16/13	AAW	Review e-mail received from Attorney Reilly and confer with Attorney Greenwood regarding spreadsheet of values needed.	0.50	\$190.00	\$95.00
10/16/13	CHG	Schedule telephone conference to discuss settlement process and values. Confer with Attorney Reilly on spreadsheet.	0.40	\$385.00	\$154.00
10/21/13	CHG	Confer with Attorney Reilly on preparation for conference, particularly his view of proposal outlined in Friday's letter.	0.90	\$385.00	\$346.50
10/22/13	AAW	Review prior research on like kind and quality. Provide same to Attorney Reilly for use at judicial settlement conference.	0.20	\$190.00	\$38.00
10/24/13	CHG	Confer with Attorney Reilly on letter to judicial settlement conference judge. Telephone conference with Mrs. Beck on status.	1.30	\$385.00	\$500.50
10/25/13	ATR	Review e-mails from Attorney Greenwood regarding upcoming mediation and issues to address prior to same.	0.40	\$315.00	
10/28/13	ATR	Confer with Attorney Greenwood regarding settlement strategy and plans for presenting case at upcoming settlement conference.	0.50	\$315.00	
10/30/13	CHG	Confer with Attorney Reilly on need to outline next steps with timelines for Mrs. Beck.	0.30	\$385.00	
11/7/13	ATR	Review prior court order regarding scheduling matters, and confer with Attorney Greenwood regarding same.	0.50	\$315.00	
11/8/13	CHG	Check status. Confirm Attorney Reilly did not receive response from Attorney Thenell. Prepare e-mail to Mrs. Beck on same.	0.15	\$385.00	
1/17/14	MES	Continue to review Beck file. Meetings with Attorneys Greenwood and Reilly to discuss case facts and procedural posture.	2.40	\$290.00	\$696.00
1/22/14	MES	Interoffice conference with Attorney Greenwood to discuss case strategy and items to discuss with Mrs. Beck during our meeting with her on Friday.	0.20	\$290.00	\$58.00
1/29/14	ATR	Review file and provide important documents to Attorney Schroeder for review. Confer with Attorney Schroeder regarding strategy going forward.	0.30	\$325.00	\$97.50
2/14/14	MES	Review and revise Notice of Substitution of Counsel for filing with the court. Forward same to Attorney Reilly for his review and comment. Review e-mail from Attorney Reilly approving same. Instruct Legal Assistant Abbott to electronically file same with the court.	0.30	\$290.00	\$87.00
2/14/14	ATR	Begin reviewing draft responses to Defendant's First Interrogatories and Requests for Production. Confer with Attorney Schroeder regarding same.	0.90	\$325.00	\$292.50
2/18/14	MES	Review and revise responses to MetLife's discovery requests to incorporate Mrs. Beck's feedback and Attorney Reilly's suggested edits. Finalize same for service on Attorney Thenell.	2.45	\$290.00	\$710.50
3/11/14	MES	Review voicemail message from Attorney Curtis concerning subpoena for Mr. Shook's file and deposition and inspection dates. Review subpoena. Interoffice conference with Attorney Reilly to discuss same. Telephone conference with Mr. Shook to discuss subpoena.	0.80	\$290.00	\$232.00
3/24/14	ATR	Confer with Attorney Schroeder regarding various strategy and discovery matters.	0.90	\$325.00	\$292.50
3/20/14	MDC	Legal research concerning discovery issues. Interoffice conference with Attorney Schroeder to discuss legal research results.	0.90	\$180.00	\$162.00
4/4/14	MES	Interoffice conference with Attorney Greenwood to discuss next steps and case strategy.	0.45	\$290.00	\$130.50
4/14/14	MES	Draft motion to quash subpoena and memorandum and declaration of Attorney Greenwood in support. Forward same to Attorneys Greenwood and Reilly for review and comment. E-mail to Attorney Thenell concerning objection to Attorney Greenwood's deposition subpoena.	2.10	\$290.00	

Date	Timekeeper	Description	Hours	Rate	Amount
4/15/14	MES	Interoffice conference with Attorney Reilly to discuss the scope and application of Fed. R. Civ. P. 26(b)(4)(D) to the Beck family depositions. E-mail to Attorney Thenell advising him that we will object to and instruct the Beck family not to answer any questions relating to Mr. Shook pursuant to this rule.	0.15	\$290.00	\$43.50
4/16/14	MDC	Review voicemails from Attorney Schroeder related to research tasks with regard to motion to quash subpoena issued to non-testifying expert.	0.20	\$180.00	\$36.00
4/16/14	MDC	Draft summary and analysis of Gerke case cited by opposing counsel. Forward same to Attorney Schroeder for her review.	0.95	\$180.00	\$171.00
4/17/14	MES	Review notes of Mrs. Beck's deposition and assemble list of additional documents requested from Attorney Thenell. E-mail same to Mrs. Beck. Instruct Attorney Colley to review same and confirm whether any of the additional documents requested by Attorney Thenell were previously included in defendant's prior document requests.	0.25	\$290.00	\$72.50
4/18/14	MDC	E-mail to Attorney Schroeder regarding initial recommendations for challenging defendant's request for financial records and estate planning documents.	0.20	\$180.00	\$36.00
4/24/14	MDC	Confer with Attorney Schroeder on strategy for arguments in motion for partial summary judgment on claim for attorney fees under ORS 742.061.	0.20	\$180.00	\$36.00
4/29/14	MDC	Review local district court rules governing deadline to file reply brief. E-mail to Attorney Schroeder concerning same.	0.30	\$180.00	\$54.00
5/12/14	MDC	Draft declaration of Attorney Schroeder in support of reply brief. Forward same to Attorney Schroeder for review and comment.	0.55	\$180.00	\$99.00
5/13/14	MES	Review document subpoena issued to Mr. Eggert, Chet Skov with Partners, Inc., and Pacific Development and Restoration. Review and respond to e-mail from Mr. Eggert concerning same. Instruct Attorney Colley to contact Attorney Thenell's office concerning objection to subpoena to Mr. Skov. Interoffice conference with Attorney Colley to discuss Attorney Curtis' claim that the notice of subpoena to Mr. Skov was issued in error. Review Amended Notice of Subpoena received from Attorney Thenell's office with the subpoena to Mr. Skov deleted.	0.25	\$290.00	\$72.50
5/14/14	ATR	Review multiple scopes and e-mails received in the spring of 2012 for evidence of McBride Construction's relationship with MetLife and details of original and revised McBride scopes. E-mail to Attorney Schroeder regarding findings and issues.	1.20	\$325.00	\$390.00
5/14/14	MDC	Confer with Attorney Schroeder on objections to document requests made during Mrs. Beck's deposition.	0.40	\$180.00	\$72.00
5/16/14	ATR	Review responses to Defendant's Second Request for Production and confer with Attorney Schroeder regarding objections and strategies for dealing with same, and possible discovery of McBride and Paul Davis Restoration files.	0.50	\$325.00	\$162.50
6/4/14	MDC	Review correspondence of Attorneys Greenwood and Reilly with opposing counsel to identify additional areas of inquiry for discovery requests.	0.30	\$180.00	\$54.00
6/4/14	MDC	E-mail to Attorney Reilly confirming scope of prior discovery requests.	0.10	\$180.00	\$18.00
6/16/14	MDC	Telephone conference with Attorney Schroeder regarding successful motion to quash subpoenas. Discuss next steps for proceeding with litigation.	0.20	\$180.00	\$36.00
6/16/14	MDC	Legal research on process for submitting documents under seal. Draft letter to accompany sealed documents. Confer with Attorney Schroeder on same.	0.75	\$180.00	\$135.00
6/16/14	MES	Review Judge Acosta's Order granting both motions to quash. Forward same to Attorney Greenwood for review and comment and for inclusion in his status report letter to Mrs. Beck.	0.10	\$290.00	\$29.00

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Date	Timekeeper	Description	Hours	Rate	Amount
6/16/14	MES	Instruct Attorney Colley to prepare letter to Judge Acosta enclosing the 3/2/2012 letter to Mr. Shook for <i>in camera</i> review. Revise and final same.	0.10	\$290.00	\$29.00
6/19/14	MDC	Review discovery deadlines and status. Interoffice conference with Attorney Schroeder to plan for further discovery.	0.20	\$180.00	\$36.00
6/26/14	MES	Review and final expert disclosure report. Instruct Legal Assistant Rourke to electronically file same with the court on Monday.	0.60	\$290.00	\$174.00
6/26/14	MES	Review and revise draft non-party subpoenas to Mr. Omundson, Paul Davis Restoration, Mr. McCabe, McBride Construction Resources, and Pacific Development & Restoration and notice of same to Attorney Thenell. Instruct Attorney Colley to final and serve tomorrow.	0.60	\$290.00	\$174.00
6/27/14	MDC	Telephone conference with Attorney Schroeder to discuss strategy for responding to the defendant's request to extend discovery deadlines. Review e-mails between Attorney Schroeder and defendant's attorney concerning same. Interoffice conference with Attorneys Merchant and Reilly to discuss same.	0.70	\$180.00	\$126.00
6/27/14	MDC	Review federal and local notice requirements for non-party subpoenas. E-mail to Attorney Schroeder concerning same. Interoffice conference with Attorney Reilly regarding subpoena targets.	0.80	\$180.00	\$144.00
6/27/14	MDC	Review e-mails from Attorney Schroeder and Attorney Greenwood regarding case status report to client. Interoffice conference with Attorney Greenwood concerning documents to include with report.	0.30	\$180.00	\$54.00
6/27/14	CHG	Review draft status update letter to Mrs. Beck. Confer with Attorney Colley on attachments thereto.	0.75	\$395.00	\$296.25
6/30/14	ATR	Review proposed expert disclosure report and verify that the Eggert report attached thereto is the final report. Confer with Legal Assistant Abbott regarding same.	0.40	\$325.00	\$130.00
6/30/14	MDC	Attend telephonic hearing on defendant's request to extend current deadlines. Interoffice conference with Attorney Merchant to discuss strategic timing of expert disclosure in light of court ruling before and after hearing.	0.80	\$180.00	\$144.00
7/1/14	MDC	Draft memorandum to Attorney Schroeder summarizing hearing on defendant's request to extend discovery deadlines.	0.80	\$180.00	\$144.00
7/1/14	MDC	Exchange e-mails with Attorney Greenwood regarding possible additional responsive documents.	0.20	\$180.00	\$36.00
7/1/14	MDC	Review e-mail exchanges between Attorney Merchant and opposing counsel regarding depositions in this matter.	0.10	\$180.00	\$18.00
7/2/14	MDC	Draft declaration in support of motion for protective order. Forward motion and declaration to Attorney Merchant for review and comment.	0.80	\$180.00	\$144.00
7/4/14	MDC	Review and respond to e-mail from Attorney Schroeder concerning deposition of Mr. Eggert.	0.20	\$180.00	\$36.00
7/7/14	MDC	Interoffice conference with Attorney Greenwood concerning status of discovery deadlines. E-mail to Attorney Greenwood identifying recent changes to same.	0.20	\$180.00	\$36.00
7/7/14	MDC	Review recent filings and communications with opposing counsel to evaluate case status and develop strategy for moving forward. E-mail to Attorney Schroeder concerning same.	1.45	\$180.00	\$261.00
7/7/14	MES	Review e-mail from Legal Assistant Abbott concerning deposition scheduling. Review current discovery deadlines and deposition schedule. Instruct Attorney Colley to contact Attorney Thenell's office and cancel Mr. Eggert's scheduled deposition on the ground that he is our testifying expert witness and to schedule depositions of Mr. Lawson and Mr. Funk.	0.35	\$290.00	\$101.50

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Date	Timekeeper	Description	Hours	Rate	Amount
		Review and respond to e-mails from Judge Acosta's clerk and Attorney Thenell concerning hearing date on motion for protective order.			
7/8/14	MDC	Review and respond to multiple e-mails from Attorney Schroeder regarding status of discovery depositions and potential motions from opposing counsel.	0.40	\$180.00	\$72.00
7/8/14	MDC	E-mail to Attorney Reilly concerning potential deponents.	0.10	\$180.00	\$18.00
7/8/14	MDC	Review and respond to multiple e-mails from Attorney Schroeder regarding preservation of evidence by nonparty contractors and deposition scheduling.	0.20	\$180.00	\$36.00
7/8/14	MDC	Telephone conference with Attorney Schroeder discussing depositions in light of discovery deadlines.	0.20	\$180.00	\$36.00
7/8/14	MDC	E-mail to Attorney Schroeder providing discovery status update.	0.30	\$180.00	\$54.00
7/10/14	MDC	Prepare case overview to aid in preparations for depositions and hearings. Review prior hearing transcripts, motions, and correspondence to prepare for interoffice conference with Attorney Schroeder concerning strategy for moving forward.	0.95	\$180.00	\$171.00
7/10/14	CHG	Conference with Attorney Schroeder on depreciation issue.	0.30	\$395.00	\$118.50
7/11/14	MES	Interoffice conference with Attorney Colley to discuss strategy for upcoming depositions and hearing on protective order.	0.85	\$290.00	\$246.50
7/11/14	MES	Review and respond to voicemail message from Attorney Prause concerning our subpoena to Pacific Development & Restoration, LLC. Instruct Attorney Colley to confirm Mr. Mooreland's current whereabouts.	0.15	\$290.00	\$43.50
7/11/14	MDC	Interoffice conference with Attorney Schroeder in preparation for deposition of Mr. McCabe, as well as conferral on strategy for completion of discovery.	0.85	\$180.00	\$153.00
7/13/14	MDC	Review and respond to multiple e-mails from Attorney Schroeder concerning strategy for deposition of Mr. McCabe.	0.30	\$180.00	\$54.00
7/14/14	MDC	Several telephone calls to investigate potential depreciation expert qualifications. E-mail to Attorneys Greenwood and Schroeder concerning same.	0.30	\$180.00	\$54.00
7/14/14	MDC	Interoffice conference with Attorney Schroeder concerning discrepancies in defendant's repair estimate calculations.	0.40	\$180.00	\$72.00
7/15/14	MDC	Review defendant's response to our motion for protective order. Interoffice conference with Attorney Schroeder analyzing same and evaluating possible arguments for reply.	0.80	\$180.00	\$144.00
7/16/14	MES	Review and revise draft reply brief in support of motion for protective order and cases cited therein. Instruct Attorney Colley to perform additional research for Oregon case law similar to the facts in this case. Revise reply to incorporate same. Final and file same with the court.	3.70	\$290.00	\$1,073.00
7/16/14	MES	Instruct Attorney Colley to draft objection to defendant's expedited hearing request on its motion to amend. Revise and final same for filing with the court.	0.30	\$290.00	\$87.00
7/17/14	MDC	E-mail to Attorney Schroeder concerning discovery issue.	0.20	\$180.00	\$36.00
7/22/14	MDC	Complete legal research on applicability of FRE 408 protections where third-parties are present during compromise negotiations. E-mail to Attorney Schroeder summarizing and analyzing same.	1.65	\$180.00	\$297.00
7/22/14	MDC	Interoffice conference with Attorney Schroeder regarding status of motion practice and preparation for depositions. Continue privilege review.	0.40	\$180.00	\$72.00
7/23/14	MES	Continue reviewing and revising response to motion to amend. Forward revised draft to Attorney Merchant for review and comment.	2.35	\$290.00	\$681.50
7/23/14	MDC	Review e-mails and voicemail from Attorney Schroeder concerning revisions and supplements to response to defendant's motion to amend.	0.40	\$180.00	\$72.00

Date	Timekeeper	Description	Hours	Rate	Amount
7/23/14	ATR	Review file and computer for e-mails of interest to or from Mr. Funk at MetLife and/or Attorney Thenell for use in opposition to MetLife's motion to amend. Confer with Attorney Colley regarding declaration and related needs and issues.	0.90	\$330.00	\$297.00
7/23/14	MES	Revise response brief to incorporate Attorney Merchant's suggested edits.	1.90	\$290.00	\$551.00
7/23/14	MDC	Evaluate additional documents from Attorney Reilly related to settlement negotiations with MetLife.	0.50	\$180.00	\$90.00
7/23/14	MDC	Telephone conference with Attorney Schroeder to discuss depositions of Mrs. Beck's children.	0.20	\$180.00	\$36.00
7/24/14	MDC	Exchange e-mails with Attorney Schroeder concerning deposition of Mr. Moreland, and depositions of MetLife Adjusters Lawson and Funk. Interoffice conference with Attorney Schroeder to plan next steps in discovery process and response to MetLife's motion for reconsideration.	0.50	\$180.00	\$90.00
7/24/14	TL	Background research on possible depreciation experts. Summarize results for Attorney Colley.	0.80	\$140.00	\$112.00
7/24/14	MDC	E-mail to Attorney Schroeder providing summary of options for depreciation expert.	0.30	\$180.00	\$54.00
7/24/14	CHG	Confer with Attorney Schroeder on additional depositions and status.	0.20	\$395.00	\$79.00
7/24/14	MES	Instruct Attorney Colley to review MetLife's motion for reconsideration and request for expedited hearing and draft objection to expedited hearing request. Review and revise draft objection. Instruct Legal Assistant Rourke to final and electronically file same with the court.	0.60	\$290.00	\$174.00
7/29/14	MDC	Plan strategy for oral argument on MetLife's motion to amend. Interoffice conference with Attorney Schroeder concerning same. Prepare e-mail to Attorney Schroeder summarizing key points to raise during argument.	2.40	\$180.00	\$432.00
7/29/14	MDC	Review Oregon-specific reference materials concerning actual, implied, and apparent authority. E-mail to Attorney Schroeder providing summary of same.	0.10	\$180.00	\$18.00
7/29/14	CHG	Review e-mail from Attorney Schroeder on status. Prepare detailed response to keep focus on defeating MetLife's motions.	0.40	\$395.00	\$158.00
7/29/14	MDC	Review correspondence between parties related to disputed repair estimates following meeting between Mr. Shook and Mr. Funk. E-mail to Attorney Schroeder summarizing findings.	0.60	\$180.00	\$108.00
7/30/14	MDC	Telephone call to Mr. Moreland concerning his availability as depreciation expert. E-mail to Attorney Schroeder with recommendations regarding preliminary file review and possible retention.	0.60	\$180.00	\$108.00
7/30/14	MDC	Review e-mails from counsel for MetLife concerning possible motions to compel production of e-mails and further depositions of Mrs. Beck's children. Interoffice conference with Attorney Schroeder to discuss same.	0.30	\$180.00	\$54.00
7/30/14	MES	Review e-mail from Attorney Colley with his analysis concerning Mrs. Beck's desire to clean up her fire-damaged home. Interoffice conference with Attorney Merchant to discuss same and ways to avoid additional possible new claims from MetLife.	0.20	\$290.00	\$58.00
7/31/14	MDC	Review correspondence from the court regarding hearing schedule on MetLife's motion for reconsideration of discovery ruling. Review and respond to e-mails from Attorney Schroeder concerning same.	0.35	\$180.00	\$63.00
7/31/14	MES	Review e-mail from Attorney Colley concerning his conversation with Mr. Moreland. Interoffice conference with Attorney Colley to identify scopes to provide to Mr. Moreland for his review.	0.30	\$290.00	\$87.00

Date	Timekeeper	Description	Hours	Rate	Amount
8/1/14	MDC	Review Federal Rules of Civil Procedure to confirm sufficiency of jury trial demand. E-mail to Attorney Schroeder concerning same.	0.30	\$180.00	\$54.00
8/1/14	CHG	Listen to voicemail message from Mrs. Beck. Confer with Attorney Schroeder on status of matter.	0.60	\$395.00	\$237.00
8/4/14	MDC	Review and respond to e-mails from Attorney Schroeder concerning status of document production by MetLife.	0.20	\$180.00	\$36.00
8/4/14	MES	Several e-mails with Attorney Colley concerning MetLife's failure to produce additional documents as promised. Instruct Attorney Colley to contact Attorney Curtis to follow up concerning same and on MetLife's request for a protective order.	0.20	\$290.00	\$58.00
8/4/14	CHG	Review Judge Acosta's ruling transcript. Prepare e-mail to Attorney Schroeder on same.	1.10	\$395.00	\$434.50
8/5/14	MDC	Interoffice and telephone conferences with Attorney Schroeder to aid preparation for Mr. Lawson's deposition.	0.65	\$180.00	\$117.00
8/6/14	MES	Interoffice conferences with Attorneys Merchant and Reilly to discuss strategies for upcoming deposition of Mr. Funk.	0.30	\$290.00	\$87.00
8/6/14	MES	Review MetLife's motion to compel. Instruct Attorney Colley to review same and to draft response for my review.	0.30	\$290.00	\$87.00
8/7/14	MDC	Telephone call to Mr. Moreland to discuss questions for deposition of Mr. Funk. E-mail to Attorney Schroeder discussing same.	0.20	\$180.00	\$36.00
8/8/14	MDC	Legal research into elements of spoliation for Attorney Schroeder's deposition of Mr. Funk. E-mail to Attorney Schroeder concerning same.	0.50	\$180.00	\$90.00
8/8/14	MDC	Interoffice conference with Attorney Greenwood concerning defendant's disclosures.	0.30	\$180.00	\$54.00
8/8/14	MES	Interoffice conference with Attorney Colley to discuss topics and issues that Mr. Funk either had no knowledge of or on which he was not allowed to testify on MetLife's behalf. Instruct Attorney Colley to draft Rule 30(b)(6) subpoena to MetLife concerning same.	0.30	\$290.00	\$87.00
8/8/14	MDC	Draft document subpoena to Mr. Gunsolley. E-mail to Attorney Schroeder concerning same.	0.40	\$180.00	\$72.00
8/8/14	MDC	Telephone conference with Attorney Schroeder concerning possible spoliation of evidence by MetLife.	0.30	\$180.00	\$54.00
8/11/14	MES	Interoffice conference with Attorney Colley to discuss response to MetLife's motion to compel.	0.30	\$290.00	\$87.00
8/11/14	MES	Review and revise response to MetLife's motion for reconsideration. Interoffice conference with Attorney Merchant to discuss same.	2.70	\$290.00	\$783.00
8/11/14	MDC	Telephone conference with Attorney Schroeder concerning revisions and strategy for response to MetLife's motion to reconsider. Review and respond to multiple e-mails from Attorney Schroeder concerning same.	0.40	\$180.00	\$72.00
8/13/14	MDC	Interoffice conferences with Attorneys Schroeder and Greenwood to discuss response to motion to compel.	0.70	\$180.00	\$126.00
8/13/14	MDC	Review and respond to multiple e-mails from Attorney Schroeder concerning revisions to response to MetLife's motion to compel. Review and revise final draft of same.	0.50	\$180.00	\$90.00
8/13/14	MBM	Review arguments regarding privilege issues and discuss with Attorney Colley.	0.40	\$375.00	\$150.00
8/13/14	MDC	Telephone conference with Mr. Eggert to discuss his expert report. Interoffice conference with Attorney Schroeder concerning same.	0.30	\$180.00	\$54.00

Date	Timekeeper	Description	Hours	Rate	Amount
8/13/14	MDC	Legal research into standard for party's motion to re-open deposition of previously deposed third party. Interoffice conferences with Attorneys Schroeder and Merchant to discuss same.	0.90	\$180.00	\$162.00
8/14/14	MDC	Interoffice conference with Attorney Schroeder concerning preparations for hearing on MetLife's motions and to discuss FRCP 30(b)(6) notice to MetLife.	0.50	\$180.00	\$90.00
8/14/14	MES	Review transcripts of the depositions of Mr. Funk and Mr. Lawson to identify additional topics for Rule 30(b)(6) deposition of MetLife's representative. Revise and final Rule 30(b)(6) deposition notice to incorporate same. Instruct Attorney Colley to final and serve same on MetLife.	1.60	\$290.00	\$464.00
8/15/14	MDC	Review court docket and correspondence and pleadings to determine whether the parties have formally consented to magistrate judge jurisdiction. E-mail to Attorney Schroeder concerning same.	0.30	\$180.00	\$54.00
8/19/14	MES	Review e-mail from Attorney Thenell asking for the reason we need MetLife's estimates in .esx format. Legal research concerning a party's obligation to produce documents requested in the form in which it is ordinarily maintained. Review scopes produced by MetLife and identify the specific scopes that we need in Xactimate format. Draft response to Attorney Thenell concerning same. Forward draft to Attorney Merchant for review and comment. Revise and final e-mail to Attorney Thenell. Several follow-up e-mails with Attorney Thenell concerning same.	2.80	\$290.00	\$812.00
8/19/14	MDC	Review and respond to e-mails from Attorney Schroeder and Attorney Merchant concerning discovery requests to MetLife.	0.20	\$180.00	\$36.00
8/19/14	MBM	Conference with Attorney Schroeder regarding discovery dispute with Attorney Thenell.	0.30	\$375.00	\$112.50
8/19/14	MDC	Review e-mails from Attorney Thenell concerning denial of document requests. Interoffice conferences with Attorney Schroeder concerning same.	0.40	\$180.00	\$72.00
8/21/14	MDC	Review e-mail from Mr. Moreland concerning the nature of Xactimate and inconsistencies in MetLife's statements concerning same. Review file of Mr. McCabe to ascertain evidence of Xactimate file transfer to him from MetLife. E-mail to Attorney Schroeder concerning potential motions to obtain withheld files.	0.75	\$180.00	\$135.00
8/21/14	MDC	Review e-mails from Attorney Wheatley concerning case law on "like kind and quality" language in insurance contracts. Review related cases from the US District for Oregon.	0.85	\$180.00	\$153.00
8/21/14	MES	Draft e-mail to Attorneys Thenell and Curtis following up on document requests. Download and review Xactimate User's Manual. Forward same to Attorneys Merchant and Colley for review and comment.	1.65	\$290.00	\$478.50
8/21/14	MDC	Review e-mail from Attorney Schroeder concerning demand to MetLife. Draft partial revision to same. Interoffice conference with Attorney Schroeder to confer on discovery strategy.	0.70	\$180.00	\$126.00
8/22/14	MES	Review transcript from last Friday's hearing concerning today's deadline to decide whether or not Mr. Shook will testify at trial. Draft letter to Attorney Thenell confirming he will not. Forward draft to Attorney Greenwood for review and comment. Final and send same to Attorney Thenell.	0.70	\$290.00	\$203.00
8/22/14	MES	Review e-mail from Attorney Thenell concerning deposition of Mr. Nickle in Florida and refusing to state when MetLife destroyed electronic information. Interoffice conferences with Attorneys Merchant and Colley to discuss same.	0.85	\$290.00	\$246.50

Date	Timekeeper	Description	Hours	Rate	Amount
8/22/14	MDC	Review e-mail from Attorney Thenell concerning discovery and organizational depositions. E-mail to Attorney Schroeder concerning same.	0.20	\$180.00	\$36.00
8/25/14	MES	Instruct Attorney Colley to review McBride's files and determine whether we received any electronic data from McBride, and if not, to follow-up with McBride on this.	0.40	\$290.00	\$116.00
8/26/14	MDC	Telephone call to Mr. Eggert to discuss labor and material cost variances and Xactimate files. E-mail to Attorney Schroeder reporting on conversation.	0.30	\$180.00	\$54.00
8/26/14	MDC	E-mail to Attorney Schroeder concerning possible remedies for MetLife's failure to produce electronic information.	0.20	\$180.00	\$36.00
8/27/14	MES	Review and respond to e-mail from Attorney Colley concerning his conversations yesterday with Mr. Eggert.	0.10	\$290.00	\$29.00
8/27/14	MES	Review and respond to e-mail from Attorney Colley concerning his review of McBride's file.	0.10	\$290.00	\$29.00
8/27/14	MDC	Review Mrs. Beck's insurance policy to determine if it limits date for determining material and labor costs. E-mails to Attorneys Schroeder and Reilly concerning same.	0.90	\$180.00	\$162.00
8/27/14	MBM	Conference with Attorney Colley regarding expert disclosures.	0.30	\$375.00	\$112.50
8/28/14	MDC	Review and respond to e-mails from Attorney Schroeder concerning conferral strategy on dispositive motions. Review local court rules governing requirements concerning same.	0.30	\$180.00	\$54.00
8/29/14	MES	Instruct Attorney Colley to contact Mr. Moreland to follow-up on the status of his expert report.	0.10	\$290.00	\$29.00
8/29/14	MES	Review MetLife's expert disclosure report. Forward same to Attorneys Greenwood and Colley and expert witnesses for review and comment. Telephone conference with Mr. Moreland and interoffice conferences with Attorneys Greenwood and Colley to discuss same.	1.80	\$290.00	\$522.00
9/3/14	MDC	Review voicemail from Xactware concerning subpoena. Telephone call with Attorney Foglia at Xactware's parent company to discuss subpoena. E-mail to Attorney Schroeder concerning same.	0.55	\$180.00	\$99.00
9/3/14	MES	Consider issues relating to MetLife's planned testimony related to Mr. Shook. Instruct Attorney Colley to research same.	0.30	\$290.00	\$87.00
9/3/14	MDC	E-mail summary and analysis of legal research on expert testimony to Attorney Schroeder.	0.70	\$180.00	\$126.00
9/3/14	CHG	Review e-mail from Attorney Colley on Xactware production. E-mail to Attorney Schroeder concerning same.	0.40	\$395.00	\$158.00
9/4/14	MES	Review and respond to e-mail from Attorney Colley forwarding e-mail from Attorney Foglia confirming Xactware will produce electronic versions of .esx files in its possession relating to the subpoena. Interoffice conference with Attorney Greenwood to discuss same.	0.40	\$290.00	\$116.00
9/4/14	MES	Detailed review of MetLife's expert disclosure report. Interoffice conference with Attorney Colley to discuss same and possible strategies for dealing with inadmissible evidence contained therein.	1.30	\$290.00	\$377.00
9/4/14	CHG	Review e-mail from Attorney Schroeder concerning expert reports. Confer with Attorney Schroeder on rebuttal reports and her discussion with Mr. Eggert.	0.70	\$395.00	\$276.50
9/10/14	MDC	Review voicemail from Attorney Curtis for MetLife concerning electronic file production. E-mail to Attorney Schroeder concerning same.	0.20	\$180.00	\$36.00
9/11/14	ATR	Review spreadsheet of various scopes and identify areas of greatest differences and forward same to Attorney Colley for review.	0.70	\$330.00	\$231.00

Date	Timekeeper	Description	Hours	Rate	Amount
9/15/14	MES	Re-review Mr. Eggert's rebuttal report. Interoffice conference with Attorney Colley to discuss same.	0.25	\$290.00	\$72.50
9/16/14	MES	Telephone conference with Attorney Thenell's paralegal, Paralegal Jensen, concerning Attorney Thenell's request for a two-day extension of the deadline to exchange expert rebuttal reports. Interoffice conference with Attorney Merchant to discuss same. Telephone conference with Paralegal Jensen to confirm that Mrs. Beck will not object to the extension so long as MetLife files a motion with the court for the extension. Follow-up telephone conference with Attorney Nomie to discuss same.	0.30	\$290.00	\$87.00
9/16/14	MDC	Review hearing transcripts and deposition testimony of Mr. Funk to assist in developing trial strategy. E-mail to Attorney Schroeder concerning same.	0.40	\$180.00	\$72.00
9/16/14	MDC	Telephone calls with Messrs. Moreland and Eggert to discuss expert rebuttal reports. E-mail to Attorney Schroeder concerning same.	0.20	\$180.00	\$36.00
9/17/14	MDC	Review Mr. Eggert's expert rebuttal report. E-mail to Attorney Schroeder concerning same.	0.35	\$180.00	\$63.00
9/19/14	MES	Review rebuttal report received from MetLife. Forward same to Attorney Greenwood, Attorney Colley, and Mr. Moreland for their review and comment. Instruct Attorney Colley to forward same to Mr. Eggert for his review and comment.	0.35	\$290.00	\$101.50
9/23/14	MDC	Telephone conference with Attorney Schroeder to discuss motion for partial summary judgment. Review file materials to identify additional supporting exhibits for motion. E-mail to Attorney Reilly concerning same.	0.60	\$180.00	\$108.00
9/23/14	MDC	Multiple telephone calls to Attorney Curtis to confer on motion for partial summary judgment. E-mail to Attorney Schroeder concerning same. E-mail to Attorney Curtis to advise of need for conferral.	0.40	\$180.00	\$72.00
9/24/14	MES	Review and respond to e-mail from Paralegal Jensen concerning proposed expert depositions on October 8, 2014. Voicemail message for Mrs. Beck concerning her availability for expert depositions on October 8 and 9, 2014 and telephone conferences with Mr. Moreland and Mr. Eggert concerning their depositions on October 8, 2014. E-mail to Paralegal Jensen and Attorney Curtis proposing deposition of Mr. Omundson on October 9, 2014.	0.35	\$290.00	\$101.50
9/24/14	MDC	Telephone conference with Attorney Schroeder to discuss strategic timing for remaining depositions.	0.10	\$180.00	\$18.00
9/25/14	MES	Telephone conference with Mrs. Beck to confirm her availability on October 8 and 9. E-mail to Paralegal Jensen confirming Mr. Moreland is available on the morning of October 8 and Mr. Eggert is available in the afternoon.	0.10	\$290.00	\$29.00
9/26/14	MES	Review and respond to e-mail from Paralegal Jensen agreeing to accept service of deposition notices for Mr. Eggert and Mr. Moreland. Instruct Attorney Colley to prepare notice of deposition of Mr. Omundson and subpoena duces tecum for the production of his file. Review and analyze documents needed from Mr. Omundson. Revise and final subpoenas for service on Attorney Thenell's office.	1.20	\$290.00	\$348.00
9/30/14	MDC	Draft summary of case law on Daubert challenges to expert witness and identify lines of questioning for upcoming expert deposition. E-mail same to Attorney Schroeder.	1.15	\$180.00	\$207.00
10/8/14	MDC	Review and respond to e-mail from Attorney Schroeder concerning strategic use of possible prior publication by MetLife expert witness.	0.20	\$180.00	\$36.00
10/9/14	MDC	Review invoices and narratives produced in expert file. Flag relevant passages for Attorney Schroeder.	0.40	\$180.00	\$72.00

Date	Timekeeper	Description	Hours	Rate	Amount
10/9/14	MDC	Review and respond to multiple e-mails from Attorney Schroeder concerning strategy for deposition of MetLife expert.	0.30	\$180.00	\$54.00
10/9/14	MDC	Telephone conference with Attorney Schroeder to discuss deposition of MetLife expert and use of same in support of motion for partial summary judgment strategy.	0.50	\$180.00	\$90.00
10/17/14	MDC	E-mail to Attorney Schroeder identifying legal research needed for Reply brief and discussing strategy for same.	0.30	\$180.00	\$54.00
10/21/14	MDC	Review and analyze authentication requirements for expert reports supporting motions for summary judgment. E-mail to Attorney Schroeder concerning same.	0.60	\$180.00	\$108.00
10/23/14	MDC	Review and analyze recent Oregon Court of Appeals decision concerning award of attorney fees under ORS 742.061. E-mail to Attorney Schroeder concerning same.	0.40	\$180.00	\$72.00
10/26/14	MES	Review e-mail from Attorney Curtis asking for stipulation concerning RCV. Review MetLife's Answer to attempt to discern the reason behind the requested stipulation. Draft response to Attorney Curtis refusing requested stipulation. Forward same to Attorneys Reilly, Greenwood, and Merchant for review and comment.	0.80	\$290.00	\$232.00
10/26/14	ATR	Review e-mail from Attorney Schroeder regarding Attorney Thenell's request for stipulation on recovery of RCV. Review file to find prior memo on issue at hand, and respond to e-mails from Attorney Schroeder regarding same and possible strategy for responding to Attorney Thenell's request.	0.70	\$330.00	\$231.00
10/27/14	MDC	Review recent Oregon Court of Appeals decision interpreting replacement cost provisions in property insurance policies. Compare language in subject policy in that case to language in Mrs. Beck's policy. E-mail to Attorney Schroeder analyzing same.	1.10	\$180.00	\$198.00
10/28/14	MDC	Review and respond to e-mail from Attorney Schroeder concerning possible MetLife motion for partial summary judgment and potential cross-motion for summary judgment. Interoffice conference with Attorney Schroeder to follow up on same.	0.40	\$180.00	\$72.00
10/29/14	MES	Review motion for partial summary judgment filed by MetLife. Instruct Attorney Colley to draft Combined Response and Cross-Motion in response to same.	0.30	\$290.00	\$87.00
10/29/14	MBM	Review MetLife's motion for partial summary judgment. Provide comments to Attorney Schroeder concerning same.	0.25	\$375.00	\$93.75
10/30/14	MDC	Review Attorney Schroeder's revisions to cross-motion for partial summary judgment. E-mail to Attorney Schroeder providing commentary and revisions on same.	0.50	\$180.00	\$90.00
11/7/14	MDC	Review and respond to e-mail from Attorney Schroeder concerning MetLife's failure to file supporting exhibits along with its reply brief.	0.10	\$180.00	\$18.00
2/10/15	CHG	Review e-mail from Attorney Schroeder on status of pending summary judgment motions.	0.25	\$405.00	\$101.25
3/17/15	CHG	Review e-mail from Attorney Schroeder on status of pending motions and timing of letter to court to follow-up on same. Prepare reply.	0.15	\$405.00	\$60.75
4/8/15	MES	Draft joint letter to Judge Acosta. Forward same to Attorney Merchant for review and comment.	0.80	\$300.00	\$240.00
5/4/15	MES	E-mail to Attorney Greenwood concerning my telephone conversation with Mrs. Beck last Friday.	0.10	\$300.00	\$30.00
5/29/15	CHG	Telephone conference with Mrs. Beck on status. Also on recommendation that she request status conference with Judge Acosta. Prepare follow up e-mail to Attorney Schroeder.	0.40	\$405.00	\$162.00

Date	Timekeeper	Description	Hours	Rate	Amount
6/1/15	MES	Instruct Legal Assistant Abbott to calculate the number of days that have passed since the under advisement date and since the parties sent a letter to Judge Acosta. Review e-mail from Legal Assistant Abbott concerning same. Begin drafting letter to Judge Acosta to again follow-up on the pending motions.	0.25	\$300.00	\$75.00
6/10/15	MES	Telephone conference with Mrs. Beck concerning MetLife's refusal to send a second joint letter to Judge Acosta. E-mail to Attorney Greenwood concerning same.	0.30	\$300.00	\$90.00
6/11/15	MES	Review and respond to e-mail from Attorney Greenwood concerning Mrs. Beck's request that we send a second letter to Judge Acosta.	0.20	\$300.00	\$60.00
7/7/15	MBM	Review decision on summary judgment and evaluate settlement options in preparation for conference with Attorney Schroeder.	0.75	\$375.00	\$281.25
7/27/15	MBM	Brief discussion with Attorney Schroeder regarding trial dates.	0.10	\$375.00	\$37.50
8/21/15	MES	Revise spreadsheet to incorporate Attorney Greenwood's suggested edits. Forward same to Attorney Greenwood for review and comment.	0.35	\$300.00	\$105.00
8/24/15	MES	Review e-mail from Attorney Curtis confirming Mr. Nickle will be attending the mediation on behalf of Metropolitan. Forward same to Attorney Greenwood.	0.10	\$300.00	\$30.00
8/25/15	CHG	Revise and finalize letter to Mrs. Beck explaining status of case and spreadsheet of numbers all in preparation for mediation. Confer with Attorney Schroeder on spreadsheet. Study spreadsheet. Determine comparison of current to January 2013 settlement offer is flawed. Prepare e-mail to Attorney Schroeder on need to correct analysis.	2.35	\$405.00	\$951.75
8/25/15	MES	Review and revise Attorney Greenwood's letter to Mrs. Beck concerning her options in mediation. Interoffice conference with Attorney Greenwood to discuss same.	0.45	\$300.00	\$135.00
8/25/15	MES	Review e-mail from Attorney Greenwood concerning error in spreadsheet. Fix same and resend to Attorney Greenwood.	0.10	\$300.00	\$30.00
8/26/15	MES	Review and revise mediation statement. Forward same to Attorney Merchant for review and comment.	2.55	\$300.00	\$765.00
8/27/15	MES	Review Attorney Merchant's suggested edits to mediation statement. Revise mediation statement to incorporate same.	2.30	\$300.00	\$690.00
9/2/15	MES	Draft detailed response to Attorney Thenell's settlement offer. Forward same to Attorney Greenwood for review and comment.	1.40	\$300.00	\$420.00
9/9/15	MDC	Prepare detailed e-mail to Attorney Schroeder concerning legal research results on statute of limitations issue.	0.40	\$190.00	\$76.00
9/9/15	MES	Review e-mail from Attorney Greenwood concerning motions in limine. Outline key evidentiary issues that need to be addressed by the court. Interoffice conference with Attorney Colley to discuss same.	1.25	\$300.00	\$375.00
9/11/15	MES	Draft response to Attorney Thenell to his request for Mrs. Beck's consent to send a subpoena to her former insurance agent. Forward same to Attorney Merchant for his review and comment.	0.65	\$300.00	\$195.00
9/12/15	MES	Review e-mail from Attorney Merchant approving draft response to Attorney Thenell. Final and send same to Attorneys Thenell and Curtis. Forward final e-mail to Mrs. Beck for her reference.	0.20	\$300.00	\$60.00
9/25/15	MES	Telephone conference with Mrs. Beck concerning MetLife's Offer of Judgment. E-mail to Attorney Greenwood concerning same.	0.25	\$300.00	\$75.00
10/2/15	MDC	Review and respond to e-mail from Attorney Schroeder concerning response to Offer of Judgment. Interoffice conference with Attorney Schroeder to discuss same.	0.20	\$190.00	\$38.00

Date	Timekeeper	Description	Hours	Rate	Amount
10/22/15	MES	Instruct Attorney Colley to draft trial memo and voir dire questions and to begin drafting motions in limine. Provide Attorney Colley with an outline of arguments and issues for same.	0.40	\$300.00	\$120.00
10/23/15	MBM	Conference with Attorney Schroeder regarding subpoena issue.	0.50	\$375.00	\$187.50
10/26/15	MES	Review and revise jury instructions. Forward same to Attorney Merchant for his review and comment.	1.15	\$300.00	\$345.00
10/27/15	MES	Finalize jury instructions. Forward same to Attorney Merchant for review and comment.	1.75	\$300.00	\$525.00
10/27/15	MDC	Draft additional issues section and conclusion in Trial Brief. Forward same to Attorney Merchant for review and comment.	0.70	\$190.00	\$133.00
10/29/15	MES	Revise special verdict form. Forward same to Attorney Merchant for review and comment.	0.30	\$300.00	\$90.00
10/30/15	MBM	Discuss form of verdict with Attorney Schroeder.	0.50	\$375.00	\$187.50
11/2/15	MDC	Review and respond to e-mails from Attorney Schroeder concerning Metropolitan's response to proposed pretrial documents.	0.40	\$190.00	\$76.00
11/3/15	MBM	Work on jury instructions and objections. Telephone conference with local attorney regarding admitted liability instruction. Advise Attorney Schroeder concerning same.	0.75	\$375.00	\$281.25
11/3/15	MES	Instruct Attorney Colley to follow-up with Mr. McCabe concerning his planned testimony. Review e-mail from Mr. McCabe instructing us to contact his lawyer, Emily Miller. Telephone conference with Attorney Miller to discuss Mr. McCabe's concerns and his planned trial testimony.	0.55	\$300.00	\$165.00
11/4/15	MDC	Telephone conference with Attorney Schroeder concerning issues related to Metropolitan's expert.	0.30	\$190.00	\$57.00
11/5/15	MES	Interoffice conference with Attorney Warren concerning her research with regard to Metropolitan's expert witness.	0.30	\$300.00	\$90.00
11/5/15	MES	Interoffice conference with Attorney Colley to discuss draft objections to defendant's pre-trial documents and motions in limine.	0.25	\$300.00	\$75.00
11/5/15	MES	Review and respond to e-mails from Attorney Thenell concerning his request for a setover of the trial date. Several e-mails with Attorneys Merchant and Colley concerning same. E-mail to Attorney Thenell confirming Mrs. Beck objects to proposed setover. Review and respond to follow-up e-mails concerning telephone conference scheduled for 2 pm tomorrow to discuss Attorney Thenell's requested setover.	0.35	\$300.00	\$105.00
11/6/15	MDC	Review e-mail from Judge Acosta concerning Metropolitan's set-over request. Conduct legal research concerning Rule 16(f) sanctions. E-mail to Attorney Schroeder concerning same for inclusion in Opposition to Motion to Continue Trial.	1.40	\$190.00	\$266.00
11/6/15	MES	Review Metropolitan's Motion to Reschedule Trial Date and declarations in support. Draft objections to same. Forward draft objections to Attorney Merchant for review and comment. Interoffice conference with Attorney Merchant to discuss same. Revise draft objections to incorporate Attorney Merchant's suggested edits. Instruct Legal Assistant Abbott to final and file same with the court.	2.80	\$300.00	\$840.00
11/9/15	MES	Continue reviewing and revising Plaintiff's Objections to Defendant's Witness Statements. Forward same to Attorney Merchant for review and comment. Interoffice conference with Attorney Merchant to discuss draft Objections to Defendant's Witness Statements. Revise same to incorporate Attorney Merchant's suggested edits. Instruct Legal Assistant Abbott to final and file same with the court.	2.25	\$300.00	\$675.00

Date	Timekeeper	Description	Hours	Rate	Amount
11/9/15	MES	Draft Plaintiff's Objections to Defendant's Deposition Designations. Forward same to Attorney Merchant for review and comment. Instruct Legal Assistant Abbott to final and file same with the court.	0.55	\$300.00	\$165.00
11/10/15	MDC	Legal research concerning subpoena power on non-party witnesses and ability to compensate same for travel expenses. E-mail to Attorney Schroeder concerning same.	0.90	\$190.00	\$171.00
11/11/15	BND	Research regarding authority of IRS publication of mileage rates. Forward research results to Attorney Schroeder.	0.30	\$180.00	\$54.00
11/11/15	MES	Review Attorney Colley's and Attorney Dirk's legal research results with regard to the amount Mrs. Beck is legally required to pay out-of-town trial witnesses. Additional legal research concerning same. Detailed e-mail to Attorney Miller concerning same.	2.95	\$300.00	\$885.00
11/14/15	MDC	E-mail to Attorney Schroeder concerning upcoming filings.	0.20	\$190.00	\$38.00
11/15/15	MES	Review and revise Plaintiff's Reply to Objections to Exhibits. Forward revised draft to Attorney Merchant for review and comment.	1.85	\$300.00	\$555.00
11/15/15	MES	Review and revise Plaintiff's Reply to Objections to Witnesses. Forward revised draft to Attorney Merchant for review and comment.	0.85	\$300.00	\$255.00
11/16/15	MES	Continue reviewing and revising Plaintiff's Objections to Deposition Designations. Forward revised draft to Attorney Merchant for review and comment.	0.85	\$300.00	\$255.00
11/16/15	MES	Continue reviewing and revising Plaintiff's Response to Motions in Limine. Forward revised draft to Attorney Merchant for review and comment.	3.15	\$300.00	\$945.00
11/16/15	MES	Instruct Attorney Colley to draft Plaintiff's Reply to Objections to Special Damages. Review and revise same. Forward revised draft to Attorney Merchant for review and comment.	2.55	\$300.00	\$765.00
11/16/15	MES	Revise Plaintiff's Reply to Objections to Witnesses to incorporate Attorney Merchant's suggested edits. Instruct Legal Assistant Abbott to proofread and final same for filing with the court.	0.20	\$300.00	\$60.00
11/19/15	MDC	Review multiple e-mails from Attorney Thenell concerning dispute over trial subpoena issued by Attorney Thenell to Ms. Sailor and deposition of Mr. Nickle. E-mail to Attorney Schroeder concerning Mr. Nickle's deposition.	0.30	\$190.00	\$57.00
11/30/15	MDC	Telephone conference with Attorney Schroeder concerning Mr. Nickle's deposition and next steps for trial preparation.	0.20	\$190.00	\$38.00
12/1/15	MDC	Draft objections to Defendant's Amended Trial Witness List. E-mail to Attorney Schroeder concerning same.	2.20	\$190.00	\$418.00
12/2/15	MDC	Review draft of Objections to Defendant's Amended Trial Witness List. E-mail to Attorney Schroeder with comments on same.	0.30	\$190.00	\$57.00
12/2/15	MES	Review and revise draft Objections to Defendant's Amended Witness Statements. Instruct Legal Assistant Abbott to electronically file same with the court.	0.70	\$300.00	\$210.00
12/2/15	MES	Draft e-mail to Attorney Thenell rejecting Metropolitan's settlement offer and extending counter-settlement offer. Forward same to Attorney Merchant for review and comment. Revise e-mail to incorporate Attorney Merchant's suggested edits and send to Attorney Thenell. Forward final e-mail to Mrs. Beck.	0.65	\$300.00	\$195.00
12/3/15	MDC	Review proposed instruction to jury from Judge Acosta and e-mail to Attorney Schroeder concerning same.	0.40	\$190.00	\$76.00
12/3/15	MES	Review and respond to e-mail from Attorney Miller to schedule telephone conference with Mr. McCabe tomorrow afternoon to discuss his planned testimony.	0.10	\$300.00	\$30.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/3/15	MES	Draft e-mail to Judge Acosta concerning issue concerning Mr. Nickle's testimony and Coverage A Plus. Forward same to Attorney Merchant for review and comment. Review e-mail from Attorney Merchant approving same. Final and send e-mail to Judge Acosta with a copy to opposing counsel and Mr. Gale.	1.80	\$300.00	\$540.00
12/3/15	MES	Review and respond to e-mails from Attorney Merchant concerning Metropolitan's counter-settlement offer and Mrs. Beck's position.	0.15	\$300.00	\$45.00
12/3/15	MES	Draft response to Metropolitan's latest settlement offer. Forward same to Attorney Colley and Attorney Merchant for review and comment. Revise and send same to Attorney Thenell.	0.45	\$300.00	\$135.00
12/4/15	MDC	Legal research for cases concerning court treatment of "Coverage A Plus" or Guaranteed Replacement Cost policy provisions. E-mail to Attorney Schroeder concerning same.	1.80	\$190.00	\$342.00
12/6/15	MES	Review e-mail from Attorney Merchant with response to Attorney Thenell's objection to our new proposed jury instruction. Draft supplement that includes Attorney Thenell's objection. Forward same to Attorney Thenell for review and comment.	0.25	\$300.00	\$75.00
12/6/15	MDC	Review and revise draft opening statement and closing argument. Forward same to Attorney Schroeder.	0.40	\$190.00	\$76.00
12/6/15	MES	Review and revise new jury instruction on other payments. Forward same to Attorney Merchant for review and comment.	0.15	\$300.00	\$45.00
12/8/15	MDC	Review multiple e-mails from Attorney Schroeder regarding necessary revisions to closing argument.	0.30	\$190.00	\$57.00
12/9/15	MDC	Review file materials to identify precise date Metropolitan was first provided with Mr. Eggert's estimate and communicate same to Attorney Schroeder.	0.90	\$190.00	\$171.00
12/10/15	MDC	Legal research on ability of party to move to enlarge the time to file motion for attorney fees under FRCP 54(d) and procedures and guidelines regarding same. Review District of Oregon local rules on attorney fees and determine whether there are standing orders concerning same. E-mail to Attorney Schroeder concerning time and process for seeking extension to file motion for attorney fees.	1.10	\$190.00	\$209.00
12/10/15	MDC	Review witness statements and disclosure documents from Mr. Moreland to aid in response to objection regarding permitting. E-mails to Attorney Schroeder concerning same.	0.30	\$190.00	\$57.00
12/10/15	MBM	Respond to questions from Attorneys Schroeder and Colley regarding Metropolitan's trial tactics. Make recommendations regarding same.	1.50	\$375.00	\$562.50
12/10/15	MDC	Review and analyze post-verdict rules and procedures. Detailed e-mail to Attorney Schroeder concerning same.	0.60	\$190.00	\$114.00
12/11/15	MBM	Respond to inquiries from Attorney Schroeder regarding checklist on receipt of verdict.	0.20	\$375.00	\$75.00
12/11/15	MBM	Receive notice of verdict and brief discussion with Attorney Schroeder regarding same.	0.10	\$375.00	\$37.50
12/15/15	MES	Draft Judgment. Forward same to Attorney Merchant for review and comment.	2.05	\$300.00	\$615.00
12/16/15	MBM	Telephone conference with expert Attorney Farnell to discuss case.	0.30	\$375.00	\$112.50
12/17/15	MES	Telephone conference with Attorney Farnell to discuss case status, procedural history, and documents needed for his review of the case.	1.35	\$300.00	\$405.00
12/18/15	MES	Draft e-mail to Attorneys Thenell and Curtis with Mrs. Beck's settlement offer. Forward same to Attorney Merchant for his review and comment.	0.40	\$300.00	\$120.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/19/15	MES	Review e-mail from Attorney Merchant approving draft e-mail concerning Mrs. Beck's settlement offer. Final and send same to Attorneys Thenell and Curtis.	0.10	\$300.00	\$30.00
1/7/16	MDC	Legal research concerning ORS 20.075(2)(f) factor. E-mail to Attorney Schroeder concerning same.	0.40	\$210.00	\$84.00
1/13/16	MES	Continue reviewing file and assembling correspondence and pleadings for Attorney Farnell's review.	2.40	\$320.00	\$768.00
1/14/16	MES	Continue reviewing file and assembling documents for Attorney Farnell's review.	1.35	\$320.00	\$432.00
1/19/16	MES	Telephone conference with Attorney Farnell concerning entry of judgment last Friday and next steps.	0.30	\$320.00	\$96.00
1/20/16	MES	Continue assembling documents for Attorney Farnell's review.	5.90	\$320.00	\$1,888.00
1/21/16	MES	Continue reviewing file and assembling documents for Attorney Farnell's review.	2.85	\$320.00	\$912.00
1/22/16	MES	Continue assembling documents for Attorney Farnell's review. Flag key documents to use in support of attorney fee motion.	2.70	\$320.00	\$864.00
1/26/16	MES	Review Attorney Merchant's and Attorney Reilly's suggested edits to attorney fee statement. Revise and final attorney fee statement. E-mail same to Attorney Farnell for his review.	3.25	\$320.00	\$1,040.00
2/11/16	MES	Assemble requested documents and provide same to Attorney Greene.	0.80	\$320.00	\$256.00
1/30/12	ATR	Meeting with Mrs. Beck to review existing scopes and bids and to discuss options and plans for moving forward. Confer with Attorney Greenwood regarding same and strategy.	1.40	\$310.00	\$434.00
1/30/12	CHG	Conference with Mrs. Beck and Attorney Reilly on claim status. Analyze and consider issues on how to proceed.	1.30	\$375.00	\$487.50
2/14/12	ATR	Confer with Attorney Greenwood regarding status and adjusters. E-mail and extended telephone conference with Mr. Shook regarding background, needs, and possible retention.	1.00	\$310.00	\$310.00
2/24/12	CHG	Telephone conference with Mrs. Beck on insurance meeting. Interoffice conference with Attorney Reilly to discuss same. Telephone conference with Mrs. Beck to confirm meeting on scope.	1.30	\$375.00	\$487.50
6/13/12	ATR	Extended telephone conferences with Mr. Shook and Mrs. Beck regarding status of Mr. Shook's report and moving forward with settlement negotiations as soon as possible.	1.30	\$310.00	\$403.00
6/13/12	CHG	Confer with Attorney Reilly on status and plan to move to final scope of repairs and settlement.	0.40	\$375.00	\$150.00
6/19/12	ATR	Review findings and analysis with Attorney Greenwood.	0.40	\$310.00	\$124.00
6/19/12	CHG	Review Attorney Reilly's e-mail on settlement options.	0.25	\$375.00	\$93.75
6/19/12	CHG	Review status with Attorney Reilly and discuss steps to close out scope of repair issues.	0.30	\$375.00	\$112.50
6/25/12	ATR	Confer with Attorney Greenwood regarding same and communication with Mrs. Beck. Plan next steps.	0.30	\$310.00	\$93.00
6/25/12	CHG	Review information on scope issues. Telephone conference with Mrs. Beck to discuss same. Prepare e-mail to Attorney Reilly on same.	0.40	\$375.00	\$150.00
6/27/12	ATR	Confer with Attorney Greenwood regarding planned further activity.	0.20	\$310.00	\$62.00
6/28/12	ATR	Multiple conferences with Attorney Greenwood on means of trying to bring scope and bid process to conclusion and possible meeting with Mr. Shook. Telephone conference with Mr. Shook regarding same.	0.90	\$310.00	\$279.00
6/28/12	CHG	Confer with Attorney Reilly on scope checklist.	0.30	\$375.00	\$112.50
7/6/12	ATR	Conferences with Attorney Greenwood regarding status and outcome of yesterday's meeting with Mr. Shook and planned course for further action.	0.60	\$310.00	\$186.00

Date	Timekeeper	Description	Hours	Rate	Amount
7/6/12	CHG	Revise issues list regarding scope of repairs. E-mail same to Mr. Shook and Mrs. Beck. Prepare follow up letter to Mrs. Beck concerning same. Confer with Attorney Reilly regarding approach to use with insurance carrier.	1.20	\$375.00	\$450.00
8/28/12	ATR	Review policy and confer with Attorney Greenwood regarding code compliance and depreciation issues.	0.50	\$310.00	\$155.00
8/28/12	CHG	Meeting with Mr. Funk at home site to introduce myself, to view damage, and set ground rules (that the rules applicable to negotiation and settlement govern the next two days' discussions). Two telephone conferences with Mr. Shook to update him. Confer with Attorney Reilly on same.	1.80	\$375.00	\$675.50
8/30/12	ATR	Extended conference with Attorney Greenwood regarding outcome of meeting and site visit with Mr. Funk and Mr. Shook.	1.20	\$310.00	\$372.00
8/30/12	ATR	Meeting with Attorney Greenwood and Mr. Shook regarding MetLife's position concerning same.	0.30	\$310.00	\$93.00
9/18/12	ATR	Confer with Attorney Greenwood regarding status and planned next steps.	0.20	\$310.00	\$62.00
9/18/12	CHG	Review e-mail from Mr. Funk. Prepare response on status.	0.80	\$375.00	\$300.00
9/28/12	ATR	Extended conference with Attorney Greenwood regarding discussion with Mr. Funk at MetLife and planned next steps.	0.70	\$310.00	\$217.00
9/28/12	CHG	Review of letter from Mr. Funk. Prepare e-mail response to same. Telephone conference with Mr. Shook on same to set conference on Tuesday. Telephone conference with Mrs. Beck to discuss Mr. Funk's letter.	1.70	\$375.00	\$637.50
1/16/13	ATR	Extended conference with Attorney Greenwood regarding settlement posture.	0.20	\$315.00	
1/16/13	CHG	Prepare edits and clarifications to draft letter to Mr. Funk proposing settlement. Confer with Attorney Reilly on same. Finalize edits and prepare e-mail to Mrs. Beck on same. Review e-mail from Mr. Funk on status. Prepare reply.	2.10	\$385.00	
1/24/13	ATR	Confer with Attorney Greenwood regarding status and e-mail exchanges with Mr. Funk and strategy going forward. Draft response e-mail to Mr. Funk for Attorney Greenwood's review and consideration.	0.40	\$315.00	
1/24/13	CHG	Review e-mail from Mr. Funk requesting conference call for January 29 including client. Prepare e-mail reply requesting purpose of call. Confer with Attorney Reilly on response. Finalize e-mail and send. Prepare follow up e-mail to Mrs. Beck concerning same.	1.30	\$385.00	
2/7/13	CHG	Finalize letter to Mrs. Beck concerning MetLife's rejection of her offer to settle and Attorney Thenell's letter of February 4, 2013. Confer with Attorney Reilly regarding same. Incorporate Attorney Reilly's comments into letter of advice to Mrs. Beck. Finalize letter. Telephone conference with Mrs. Beck to discuss same.	3.40	\$385.00	
2/11/13	ATR	Interoffice conference with Attorney Greenwood regarding planned further activity in dealing with Attorney Thenell and possible filing of lawsuit against MetLife.	0.70	\$315.00	
2/11/13	CHG	Telephone conference with Mrs. Beck to discuss next steps. Prepare memorandum to file concerning same. Review statute on recovery of attorney fees and costs. Confer with Attorney Reilly on cost to file Complaint and timing of same.	1.30	\$385.00	
2/12/13	ATR	Interoffice conference with Attorney Greenwood to discuss case strategy and recommended response to Attorney Thenell's letter.	1.70	\$315.00	
2/12/13	CHG	Review e-mail from Mr. Eggert and respond. Review status of case and consider how to respond to Attorney Thenell's letter.	1.60	\$385.00	
2/13/13	ATR	Review and respond to e-mail from Attorney Greenwood regarding date of proof of loss.	0.70	\$315.00	

Date	Timekeeper	Description	Hours	Rate	Amount
2/13/13	CHG	Review letter from Attorney Thenell. Confer with Attorney Reilly on response to same. Draft response.	1.40	\$385.00	
2/14/13	ATR	Review and revise draft letter from Attorney Greenwood to Attorney Thenell. Confer with Attorney Greenwood regarding strategy and planned next steps.	2.05	\$315.00	
2/14/13	CHG	Listen to voicemail message from Mrs. Beck. Telephone conference with Mrs. Beck concerning next steps. Review and revise letter to Attorney Thenell.	3.60	\$385.00	
4/17/13	AAW	Meet and confer with Attorney Greenwood to discuss case facts and legal research needed.	0.45	\$190.00	\$85.50
4/17/13	CHG	Continue reviewing Mr. Eggert's report. Instruct Attorney Wheatley to research depreciation and like kind and quality term used in the policy.	1.70	\$385.00	\$654.50
4/19/13	ATR	Confer with Attorney Wheatley and Attorney Greenwood regarding findings and analysis.	0.40	\$315.00	\$126.00
4/19/13	AAW	Review e-mail received from Attorney Greenwood regarding Oregon law on insurance policies. Conduct additional legal research regarding like kind and quality policy language.	1.00	\$190.00	\$190.00
4/23/13	ATR	Draft memorandum of findings and e-mail to Attorney Greenwood regarding same.	2.30	\$315.00	\$724.50
4/23/13	AAW	Review e-mail from Attorney Greenwood with follow up question on prior research results. Review and confirm prior research. E-mail to Attorney Greenwood concerning same.	1.80	\$190.00	\$342.00
4/30/13	ATR	Confer with Attorney Greenwood regarding strategy and needs going forward.	0.30	\$315.00	\$94.50
4/30/13	CHG	Revise demand letter to MetLife. Review Attorney Reilly's comments and insert his suggested edits into letter. Revise letter further to add costs demand. Telephone conference with Mrs. Beck to discuss and schedule meeting to review demand letter.	1.80	\$385.00	\$693.00
5/1/13	ATR	Meeting with Mrs. Beck and Attorney Greenwood to discuss latest demand letter, strategy for pursuing settlement, and planned further activity.	2.30	\$315.00	\$724.50
5/2/13	ATR	Review and respond to e-mails from Mr. Eggert regarding his ACV calculations. Review and respond to e-mails from Attorney Greenwood regarding same.	2.70	\$315.00	\$850.50
5/2/13	CHG	Review e-mail from Mr. Eggert on depreciation. Prepare response. Review draft letter to edit demand to conform to Mr. Eggert's position on depreciation. Confer with Attorney Reilly to discuss Mr. Eggert's report and confirm same will be sent to MetLife.	1.60	\$385.00	\$616.00
5/14/13	CHG	Confer with Attorney Reilly to request he call Attorney Thenell's paralegal on May 15 to confirm receipt of our May 13 e-mail.	0.15	\$385.00	\$57.75
5/14/13	ATR	Review e-mail from Attorney Greenwood to Attorney Thenell regarding Eggert's report and extension of time to respond to demand. Confer with Attorney Greenwood regarding demands in e-mail to Attorney Thenell and planned action in event of no satisfactory response.	0.60	\$315.00	\$189.00
5/15/13	ATR	Draft e-mail to Attorney Greenwood regarding strategy going forward and recommended course of action.	0.60	\$315.00	\$189.00
5/15/13	CHG	Confer with Attorney Reilly on his contact with Attorney Thenell's paralegal. Review fax of letter from Attorney Thenell's office. Prepare e-mail to Mrs. Beck forwarding Attorney Thenell's letter with our initial comments.	0.80	\$385.00	\$308.00
5/20/13	ATR	Confer with Attorney Greenwood concerning draft Complaint and timing for filing of same.	0.40	\$315.00	\$126.00

Date	Timekeeper	Description	Hours	Rate	Amount
5/20/13	CHG	Listen to voicemail message from Mrs. Beck. Return call to Mrs. Beck to discuss her concerns. Confer with Attorney Reilly on preparing Complaint and need to consider and decide whether to proceed in federal or state court.	0.70	\$385.00	\$269.50
5/21/13	ATR	Research options for suit against MetLife and consider pros and cons of federal versus state court. Confer with Attorney Merchant regarding same.	1.40	\$315.00	\$441.00
5/21/13	CHG	Confer with Attorney Reilly on Complaint. Telephone conference with Mrs. Beck on same.	0.30	\$385.00	\$115.50
5/22/13	ATR	Confer with Attorney Greenwood regarding same.	0.35	\$315.00	\$110.25
5/22/13	CHG	Review e-mail from Attorney Reilly with attached Complaint. Prepare e-mail forwarding same to Mrs. Beck for review.	0.40	\$385.00	\$154.00
6/24/13	AAW	Confer with Attorney Reilly regarding status of federal case and determine whether matter is ripe for default. Confer with Paralegal Labrum regarding matter and need for default documents.	0.70	\$190.00	\$133.00
6/24/13	ATR	Confer with Attorney Wheatley regarding need to prepare and file Motion for Order of Default.	0.30	\$315.00	\$94.50
7/10/13	ATR	Confer with Attorney Greenwood regarding strategy and planned next steps. Review and respond to e-mail regarding case status and strategy going forward.	0.65	\$315.00	\$204.75
7/10/13	CHG	Review e-mails from Attorney Reilly concerning case status.	0.30	\$385.00	\$115.50
7/18/13	ATR	Confer with Attorney Greenwood regarding status and plans for strategy for conference with Attorney Thenell.	0.20	\$315.00	\$63.00
7/18/13	CHG	Confer with Attorney Reilly on Monday's telephone conference with Attorney Thenell.	0.30	\$385.00	\$115.50
9/18/13	ATR	Confer with Attorney Greenwood regarding strategy for pursuing settlement and expectations for same.	0.30	\$315.00	\$94.50
9/18/13	CHG	Confer with Attorney Reilly on status conference and Attorney Thenell's request for judicial settlement conference versus mediation.	0.70	\$385.00	\$269.50
10/18/13	ATR	Confer with Attorney Greenwood regarding status and strategy for approaching settlement conference.	1.20	\$315.00	\$378.00
10/18/13	CHG	Review spreadsheet from Attorney Reilly. Confer with Attorney Reilly on same. Draft privileged and confidential letter to Mrs. Beck on new spreadsheet and settlement range under insurance contract.	1.80	\$385.00	\$693.00
10/22/13	ATR	Participate in extended meeting with Mrs. Beck and Attorney Greenwood.	1.60	\$315.00	\$504.00
10/22/13	CHG	Prepare for and conference with Mrs. Beck and Attorney Reilly to discuss and prepare Mrs. Beck for upcoming judicial settlement conference on October 29, 2013.	2.10	\$385.00	\$808.50
10/25/13	CHG	Review draft letter to Judge Haggerty. Provide Attorney Reilly with edits to same.	1.10	\$385.00	\$423.50
10/25/13	ATR	Revise letter to Judge Haggerty regarding mediation to incorporate Attorney Greenwood's edits. Final same for delivery to Judge Haggerty.	1.00	\$315.00	\$315.00
1/8/14	MES	Meeting with Mrs. Beck together with Attorney Greenwood to discuss change in representation.	0.50	\$290.00	\$145.00
1/17/14	MES	Interoffice conference with Attorney Reilly to discuss and identify next steps and anticipated cost of same. Detailed e-mail to Attorney Greenwood concerning same.	3.00	\$290.00	\$870.00
1/17/14	ATR	Extended conference with Attorney Schroeder regarding steps and budget for moving forward, strategy for bringing matter to resolution, and planning activity relating to same.	2.20	\$325.00	\$715.00
1/24/14	MES	Interoffice conference with Attorney Greenwood to discuss issues for discussion with Mrs. Beck.	0.40	\$290.00	\$116.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/24/14	CHG	Prepare for meeting with client. Confer with Attorney Schroeder. Attend two-hour meeting. (2.5 hours - No Charge).	0.00	\$395.00	\$0.00
4/11/14	ATR	Extended conference with Attorney Schroeder regarding strategy points and deposition issues, and possible motions to quash subpoenas issued to Attorney Greenwood and Mr. Shook.	0.70	\$325.00	
4/11/14	MES	Interoffice conference with Attorney Reilly to discuss issues for upcoming depositions.	0.40	\$290.00	
4/11/14	MES	Interoffice conference with Attorney Greenwood to discuss case status and issues for upcoming depositions.	0.65	\$290.00	
4/14/14	ATR	Confer with Attorney Schroeder regarding discovery issues relating to Mr. Shook and Attorney Greenwood's depositions and related discovery, and strategy for responding to such discovery requests. Research possible means of quashing subpoenas upon Mr. Shook and Mr. Greenwood, and scope of trial preparation materials privilege. Review and revise motion to quash and supporting materials.	1.85	\$325.00	
4/14/14	MES	Interoffice conferences with Attorneys Reilly and Greenwood to discuss proposed motions to quash.	0.40	\$290.00	
4/16/14	MDC	Review relevant FRCP provisions regarding expert discovery. Review and analyze case law cited by opposing counsel on those provisions. Confer with client and Attorneys Greenwood and Schroeder regarding applicability of attorney client privilege.	1.20	\$180.00	\$216.00
4/16/14	MDC	Discuss research tasks related to anticipated motions in limine and motion for partial summary judgment with Attorney Schroeder.	0.50	\$180.00	\$90.00
4/16/14	MES	Interoffice conference with Attorney Colley to discuss case facts and legal research needed for possible motions in limine and motion for partial summary judgment.	0.50	\$290.00	\$145.00
4/16/14	MDC	Draft summary and analysis of motions in limine research for Attorney Schroeder. Confer with Attorney Schroeder on strategy and timing for motions in limine.	0.80	\$180.00	\$144.00
4/16/14	CHG	Confer with Attorney Schroeder on Attorney Thennell's assertion that he can depose Mrs. Beck about discussions with her lawyer. Advise Attorney Schroeder to oppose even if the federal judge has to become involved. Confer with Mrs. Beck and Attorney Schroeder on outcome and cancellation of other depositions of Mrs. Beck's children.	1.50	\$395.00	\$592.50
4/17/14	MES	Interoffice conference with Attorney Colley to discuss arguments for motions in limine and motion for protective order.	0.20	\$290.00	\$58.00
4/17/14	ATR	Confer with Attorney Colley regarding assignment to draft motions in limine and background necessary for same, and strategy for arguing certain points.	0.80	\$325.00	\$260.00
4/29/14	MDC	Confer with Attorney Schroeder on arguments for reply briefs in support of motions to quash.	0.30	\$180.00	\$54.00
4/29/14	MES	Instruct Attorney Colley to review documents filed by Attorney Thennell in response to our motions to quash. Interoffice conference with Attorney Colley to discuss same.	0.30	\$290.00	\$87.00
5/12/14	MES	Interoffice conference with Attorney Colley to discuss draft replies in support of motions to quash.	0.15	\$290.00	\$43.50
5/12/14	MDC	Confer with Attorney Schroeder on final strategy for reply briefs.	0.30	\$180.00	\$54.00
5/13/14	MDC	Confer with Attorney Schroeder on response to defendant's notice of subpoenas to non-parties.	0.20	\$180.00	\$36.00
5/13/14	ATR	Confer with Attorney Schroeder regarding recent events and proposed motion for partial summary judgment.	0.40	\$325.00	\$130.00
5/29/14	MES	Interoffice conference with Attorney Colley to discuss document subpoenas needed. Instruct Attorney Colley to draft same.	0.30	\$290.00	\$87.00
5/29/14	MDC	Interoffice conference with Attorney Schroeder to discuss targets for non-party subpoenas and current status of discovery.	0.30	\$180.00	\$54.00

Date	Timekeeper	Description	Hours	Rate	Amount
6/27/14	MES	Review e-mail from Attorney Thenell objecting to our refusal to stipulate to further delay of the discovery deadlines and Attorney Thenell's e-mail to Judge Acosta's clerk requesting a telephone conference to discuss same. E-mail to Judge Acosta's clerk informing him that Attorney Merchant will be covering this matter for me while I am out of the country on vacation. Several e-mails to and follow-up telephone conference with Attorneys Merchant and Colley to discuss strategy for opposition and motion for protective order needed in response to MetLife's subpoenas to Mrs. Beck's banks. Instruct Legal Assistant Rourke to wait to file the expert disclosure report until after the new discovery dates are established during the hearing on Monday.	0.85	\$290.00	\$246.50
6/27/14	ATR	Review and revise objection to request to extend discovery deadlines. Confer with Attorney Colley regarding same.	0.60	\$325.00	\$195.00
6/27/14	MDC	Interoffice conference with Attorney Reilly regarding prior communications concerning discovery.	0.30	\$180.00	\$54.00
6/30/14	MDC	Interoffice conference with Attorney Greenwood regarding status of filings and motions.	0.20	\$180.00	\$36.00
6/30/14	CHG	Short conference with Attorney Colley on Wells Fargo records and MetLife's subpoena of same. Telephone conference with Mrs. Beck concerning same and planned motion for protective order.	0.20	\$395.00	\$79.00
7/1/14	MDC	Interoffice conferences with Attorneys Reilly and Greenwood to discuss additional documents that may be responsive to defendant's document requests.	0.70	\$180.00	\$126.00
7/1/14	CHG	Review e-mail from Attorney Colley regarding Green Gables estimate. Pull files and locate document. Provide Green Gables drawing and estimate to Attorney Colley.	1.30	\$395.00	\$513.50
7/1/14	ATR	Review e-mail from Attorney Colley regarding Attorney Thenell's discovery requests and search for additional estimates or any information on Green Gables and its estimate, if any.	0.80	\$330.00	\$264.00
7/1/14	MDC	Interoffice conference with Attorney Merchant concerning timing of subpoenas to non-party contractors.	0.20	\$180.00	\$36.00
7/8/14	MES	Interoffice conference with Attorney Colley to discuss deposition scheduling.	0.20	\$290.00	\$58.00
7/8/14	ATR	Review e-mail from Attorney Colley regarding possible witnesses to depose. Review e-mails and correspondence from early in process to determine whether any possible witnesses were overlooked.	0.80	\$330.00	\$264.00
7/9/14	MDC	Interoffice conference with Attorney Greenwood regarding depreciation factor and prior settlement discussions with Adjuster Funk.	0.50	\$180.00	\$90.00
7/10/14	MES	Interoffice conference with Attorney Greenwood to discuss case status and next steps.	0.15	\$290.00	\$43.50
7/14/14	MDC	Interoffice conference with Attorney Schroeder to discuss strategy for depositions of defendant's adjusters.	0.40	\$180.00	\$72.00
7/14/14	MES	Several e-mails with Attorney Thenell concerning his unavailability for the planned depositions of Mr. Funk and Mr. Lawson. Instruct Attorney Colley to draft unopposed motion to extend deposition deadline to allow these depositions to take place the first week of August.	0.40	\$290.00	\$116.00
7/14/14	MES	Interoffice conference with Attorney Merchant and Attorney Colley to discuss possible motion for partial summary judgment based on Mr. Lawson's January 11, 2012 scope.	0.40	\$290.00	\$116.00
7/14/14	MBM	Conference with Attorney Schroeder to discuss evidence supporting breach.	0.20	\$375.00	\$75.00

Date	Timekeeper	Description	Hours	Rate	Amount
7/16/14	MES	Review defendant's motion to amend. Forward same to Attorney Colley and instruct him to review same and begin researching cases in opposition to MetLife's motion. Interoffice conference with Attorney Colley to discuss same.	0.30	\$290.00	\$87.00
7/16/14	MDC	Interoffice conference with Attorney Schroeder concerning additional legal research needed for hearing on motion for protective order. Legal research on cases where an insurance company sought the private financial information of an insured.	0.80	\$180.00	\$144.00
7/16/14	MDC	Review MetLife's motion for leave to amend Answer and affirmative defenses, proposed Amended Answer, and supporting declaration. Interoffice conference with Attorney Schroeder to discuss same.	0.70	\$180.00	\$126.00
7/16/14	MBM	Conference with Attorney Schroeder regarding hearing issues.	0.30	\$375.00	\$112.50
7/16/14	MES	Interoffice conference with Attorney Merchant to discuss arguments in opposition to MetLife's motion to amend.	0.30	\$290.00	\$87.00
7/17/14	MDC	Interoffice conference with Attorney Schroeder to aid preparation for hearing on motion to compel and MetLife's motion to amend.	0.40	\$180.00	\$72.00
7/17/14	MES	Attend hearing on motion for protective order. Strategy meeting afterwards with Attorney Colley to discuss and prioritize next litigation tasks.	2.25	\$290.00	\$652.50
7/17/14	ATR	Confer with Attorney Schroeder regarding discovery and outcome of hearing on motion for protective order, and strategy going forward.	0.40	\$330.00	\$132.00
7/17/14	MDC	Interoffice conference with Attorney Schroeder and Attorney Reilly to discuss impact of winning motion for protective order.	0.10	\$180.00	\$18.00
7/18/14	MES	Several interoffice conferences with Attorney Colley concerning discovery issues.	1.15	\$290.00	\$333.50
7/18/14	MDC	Interoffice conference with Attorney Schroeder to discuss Metlife's motion to compel.	0.50	\$180.00	\$90.00
7/21/14	MES	Interoffice conference with Attorney Colley to discuss discovery issues.	0.30	\$290.00	\$87.00
7/21/14	MDC	Interoffice conference with Attorney Schroeder to discuss discoverability of documents.	0.30	\$180.00	\$54.00
7/23/14	MDC	Interoffice conferences with Attorneys Merchant, Reilly, Schroeder, and Greenwood to discuss supporting declarations and exhibits for response to motion to amend.	0.50	\$180.00	\$90.00
7/23/14	MBM	Conference with Attorney Schroeder regarding brief. Review and revise brief and declarations in support.	1.00	\$375.00	\$375.00
7/23/14	CHG	Review and revise declaration. Confer with Attorney Schroeder concerning revisions. Review and approve revised declaration.	1.80	\$395.00	\$711.00
7/23/14	MDC	Interoffice conferences with Attorneys Reilly and Merchant regarding strategy for opposing motion to amend.	0.40	\$180.00	\$72.00
7/25/14	MES	Interoffice conference with Attorney Colley to discuss strategy for response to MetLife's motion for reconsideration.	0.20	\$290.00	\$58.00
7/25/14	MDC	Interoffice conferences with Attorneys Reilly and Schroeder concerning procedural posture of the motion.	0.25	\$180.00	\$45.00
7/30/14	MDC	Interoffice conference with Attorney Schroeder to prepare for hearing on MetLife's motion to amend. Post-hearing interoffice conference with Attorney Schroeder to discuss response brief to MetLife's motion for reconsideration and preparation of dispositive motions.	0.90	\$180.00	\$162.00
7/30/14	MES	Interoffice conferences with Attorneys Colley, Merchant, and Greenwood concerning the outcome of today's hearings and comments made by Judge Acosta during the hearing.	0.25	\$290.00	\$72.50
7/30/14	ATR	Confer with Attorney Schroeder regarding response to motion for reconsideration and need to locate or identify what was sent to Mr. Funk on July 12 or 13, 2012. Review all e-mails in system from July of 2012 to identify what, if anything, was sent to Mr. Funk.	0.90	\$330.00	\$297.00

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11652

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Date	Timekeeper	Description	Hours	Rate	Amount
7/30/14	CHG	Confer with Attorney Schroeder on status of matter including Judge Acosta's denial of MetLife's motion to amend.	0.30	\$395.00	\$118.50
7/30/14	MBM	Conference with Attorney Schroeder regarding future motions.	0.30	\$375.00	\$112.50
7/31/14	MES	Interoffice conference with Attorney Colley to discuss arguments in response to MetLife's motion for reconsideration.	1.20	\$290.00	\$348.00
7/31/14	MDC	Interoffice conference with Attorney Schroeder concerning strategy for response brief to MetLife's motion for reconsideration. Review draft e-mail to counsel for MetLife requesting he withdraw said motion and provide comments to Attorney Schroeder.	1.65	\$180.00	\$297.00
8/1/14	MES	Interoffice conference with Attorney Greenwood to discuss MetLife's documents requests.	0.35	\$290.00	\$101.50
8/1/14	MDC	Interoffice conferences with Attorney Schroeder to discuss and analyze problems with MetLife's "sword and shield" argument related to bids prepared by Mr. Shook. Review e-mail from Attorney Schroeder concerning same to aid drafting of response to MetLife's motion for reconsideration.	0.40	\$180.00	\$72.00
8/7/14	CHG	Confer with Attorney Schroeder on status and Mr. Funk's upcoming deposition. Telephone conference with Mrs. Beck to discuss case status.	0.60	\$395.00	\$237.00
8/7/14	MDC	Interoffice conference with Attorney Schroeder to discuss strategy for oral argument on MetLife's motion for reconsideration and to plan response to MetLife's motion to compel discovery.	0.30	\$180.00	\$54.00
8/8/14	MES	Interoffice conference with Attorneys Greenwood and Colley to discuss Mr. Funk's deposition and next steps.	0.90	\$290.00	\$261.00
8/8/14	CHG	Confer with Attorney Schroeder on Funk deposition. Advise on need to go after electronic information behind each scope.	1.10	\$395.00	\$434.50
8/11/14	MDC	E-mail to Attorney Reilly concerning Mr. Eggert's scope and bid. E-mail to Attorney Schroeder concerning same. Telephone call with Mr. Eggert to discuss his scope and bid. Interoffice conference with Attorney Schroeder to discuss same.	0.25	\$180.00	\$45.00
8/11/14	MES	Interoffice conference with Attorney Colley to discuss his conversations with Mr. Eggert.	0.15	\$290.00	\$43.50
8/11/14	MES	Interoffice conference with Attorney Reilly to discuss the basis for the figure in paragraph 19 of plaintiff's Complaint. Draft declaration for Attorney Reilly's signature concerning same.	0.80	\$290.00	\$232.00
8/11/14	ATR	Confer with Attorney Colley regarding Eggert scope and bid and with Attorney Schroeder regarding basis for allegations in paragraph 19 of the Complaint.	0.70	\$330.00	\$231.00
8/13/14	MDC	Interoffice conference with Attorney Schroeder to discuss strategy for Friday hearing on defendant's motions. E-mails to court reporter concerning filing of certified transcript of prior hearing.	0.40	\$180.00	\$72.00
8/13/14	MES	Interoffice conference with Attorney Colley to discuss additional arguments for response to MetLife's motion to compel. Revise response to incorporate Attorney Colley's suggested edits. Final and electronically file same with the court.	1.10	\$290.00	\$319.00
8/15/14	MDC	Interoffice conference with Attorney Schroeder concerning strategy following denial of MetLife's discovery motions.	1.10	\$180.00	\$198.00
8/15/14	MES	Interoffice conference with Attorneys Greenwood and Colley to discuss the outcome of today's hearing and decision concerning Mr. Shook.	1.10	\$290.00	\$319.00
8/15/14	MES	Interoffice conference with Attorney Merchant to discuss the outcome of today's hearing and decision concerning Mr. Shook.	0.70	\$290.00	\$203.00
8/15/14	CHG	Confer with Attorney Schroeder on Judge's ruling and whether she will call Mr. Shook as rebuttal witness.	0.65	\$395.00	\$256.75

Date	Timekeeper	Description	Hours	Rate	Amount
8/18/14	MES	Interoffice conference with Attorney Colley to discuss expert disclosure report.	0.20	\$290.00	\$58.00
8/18/14	MDC	Interoffice conference with Attorney Schroeder concerning rebuttal expert strategy and preparations for motion for partial summary judgment.	0.15	\$180.00	\$27.00
8/20/14	MES	Review e-mail from Attorney Thenell again refusing to produce the Xactimate files. Voicemail message for and e-mail to Mr. Moreland and interoffice conference with Attorney Merchant concerning same. E-mail to Attorney Thenell requesting confirmation as to when MetLife destroyed the electronic versions of its Xactimate estimates.	0.60	\$290.00	\$174.00
8/20/14	MBM	Conference with Attorney Schroeder regarding discovery issue.	0.20	\$375.00	\$75.00
8/20/14	CHG	Confer with Attorney Schroeder on need to obtain electronic versions of MetLife's Xactimate scopes.	0.45	\$395.00	\$177.75
8/21/14	MES	Interoffice conference with Attorneys Greenwood and Colley to discuss next steps with regard to additional Xactimate data needed.	1.15	\$290.00	\$333.50
8/21/14	MDC	Interoffice conference with Attorney Schroeder and Attorney Greenwood to identify best method to obtain withheld discovery from MetLife.	1.20	\$180.00	\$216.00
8/21/14	AAW	Confer with Attorney Greenwood regarding like-kind and quality issues and review previous research on matter. Forward same to Attorney Colley for his use.	0.40	\$195.00	\$78.00
8/21/14	CHG	Confer with Attorney Schroeder on electronic versions of Xactimate and MetLife's refusal to turn over the versions behind their report. Analysis of same. Discuss further with Attorney Schroeder regarding next steps.	1.10	\$395.00	\$434.50
8/22/14	CHG	Confer with Attorney Schroeder on electronic programs and urge her to subpoena same for all MetLife scopes. Review follow up e-mail sent to Attorney Thenell.	0.90	\$395.00	\$355.50
8/22/14	MBM	Conference with Attorney Schroeder regarding electric data question.	0.20	\$375.00	\$75.00
8/22/14	MDC	Interoffice conference with Attorney Schroeder concerning the need for additional subpoenas to pursue electronic files.	0.30	\$180.00	\$54.00
8/25/14	MDC	Review and respond to e-mail from Attorney Schroeder concerning strategy for motion for partial summary judgment. Interoffice conference with Attorney Schroeder to discuss same.	0.65	\$180.00	\$117.00
8/25/14	MES	Interoffice conference with Attorney Colley to discuss Mr. Moreland's findings concerning depreciation. Instruct Attorney Colley to review and summarize the deposition transcripts of Mr. Lawson and Mr. Funk and identify and draft questions for deposition of MetLife's designated representative, Mr. Nickle.	0.30	\$290.00	\$87.00
8/25/14	MES	Interoffice conference with Attorney Greenwood to discuss Mr. Moreland's report on depreciation. Telephone conference with Mr. Moreland to discuss same.	1.10	\$290.00	\$319.00
8/26/14	MES	Interoffice conference with Attorney Merchant to discuss motion for partial summary judgment.	0.25	\$290.00	\$72.50
8/26/14	MDC	Telephone conference with Attorney Schroeder to discuss trial preparation strategy.	0.25	\$180.00	\$45.00
8/27/14	ATR	Review and respond to e-mails from Attorney Colley regarding possible adjustment of cost of repair to meet market conditions at time of repair. Review policy for guidance in language used. Confer with Attorney Colley regarding findings and strategy for argument.	0.60	\$330.00	\$198.00
8/27/14	MES	Interoffice conference with Attorney Colley to discuss his follow-up conversation with Mr. Eggert concerning his expert report.	0.30	\$290.00	\$87.00
8/27/14	MDC	Interoffice conferences with Attorneys Schroeder and Merchant concerning strategy and requirements for expert disclosure.	0.30	\$180.00	\$54.00

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Date	Timekeeper	Description	Hours	Rate	Amount
8/28/14	MES	Interoffice conference with Attorney Greenwood to discuss additional discovery needed. Instruct Attorney Colley to contact McBride to request electronic information included in prior subpoena.	0.40	\$290.00	\$116.00
8/28/14	MES	Interoffice conference with Attorney Colley to discuss how best to present evidence of the damage to Mrs. Beck's home to a jury. Instruct Attorney Colley to research the grounds for conducting a site visit with a jury.	0.15	\$290.00	\$43.50
8/28/14	MES	Interoffice conference with Attorney Greenwood to discuss expert reports and trial strategy.	0.40	\$290.00	\$116.00
8/28/14	CHG	Confer with Attorney Schroeder on expert reports, discovery issues, and trial strategy.	0.70	\$395.00	\$276.50
8/28/14	MBM	Conference with Attorney Schroeder regarding expert issues.	0.20	\$375.00	\$75.00
8/29/14	MDC	Review Mr. Moreland's expert report. Discuss dispositive motion and trial strategy related to same with Attorney Schroeder.	1.05	\$180.00	\$189.00
8/29/14	MBM	Receive and reply to Attorney Schroeder's question regarding expert disclosure.	0.20	\$375.00	\$75.00
8/29/14	CHG	Review MetLife's expert report. Confer with Attorney Schroeder on same.	1.30	\$395.00	\$513.50
9/2/14	MES	Interoffice conference with Attorney Greenwood to discuss status of subpoena to Xactware and expert rebuttal reports.	0.30	\$290.00	\$87.00
9/2/14	CHG	E-mail to Attorney Schroeder concerning MetLife's expert report.	0.90	\$395.00	\$355.50
9/3/14	MES	Review e-mail from and interoffice conference with Attorney Colley to discuss his telephone conference with Xactware's attorney concerning subpoena duces tecum. Instruct Attorney Colley to follow-up with Attorney Foglia tomorrow morning on the requested production of electronic information, and if none is available, to request all documents relating to the destruction of same and Xactware's document retention policies.	0.35	\$290.00	\$101.50
9/3/14	MES	Instruct Attorney Colley to contact Mr. Eggert and Mr. Moreland to discuss expert rebuttal reports needed and deadline for serving same on MetLife's counsel. Interoffice conference with Attorney Colley to discuss same.	0.20	\$290.00	\$58.00
9/3/14	MDC	Interoffice conference with Attorney Schroeder to discuss rebuttal expert strategy and to confer on research assignment related to hearsay exceptions for expert witnesses.	0.50	\$180.00	\$90.00
9/4/14	MDC	Interoffice conference with Attorney Schroeder to discuss motions practice and trial strategies to challenge inadmissible evidence in MetLife's expert report.	1.00	\$180.00	\$180.00
9/4/14	MES	Interoffice conference with Attorney Merchant to discuss MetLife's expert report and ways to redact same for use in support of Mrs. Beck's motion for partial summary judgment.	0.35	\$290.00	\$101.50
9/5/14	CHG	Review Judge Acosta's opinion denying motion for reconsideration. Confer with Attorney Schroeder on tactics going forward to ensure rebuttal reports are ready.	1.10	\$395.00	\$434.50
9/8/14	MES	Interoffice conference with Attorney Greenwood to discuss MetLife's expert report and our experts' rebuttal reports.	0.60	\$290.00	\$174.00
9/11/14	MDC	Interoffice conference with Attorney Schroeder concerning status of expert rebuttal reports.	0.40	\$180.00	\$72.00
9/15/14	MBM	Conference with Attorney Schroeder regarding witness issues.	0.30	\$375.00	\$112.50
9/16/14	CHG	Interoffice conference with Attorney Greenwood to discuss expert rebuttal reports.	0.20	\$395.00	\$79.00
9/16/14	MES	Additional legal research concerning MetLife's planned testimony related to Mr. Shook. Interoffice conferences with Attorney Merchant and Greenwood to discuss same.	2.10	\$290.00	\$609.00
9/16/14	MDC	Interoffice conference with Attorney Schroeder to discuss strategy for expert rebuttal report disclosure.	0.60	\$180.00	\$108.00

Date	Timekeeper	Description	Hours	Rate	Amount
9/23/14	MDC	Telephone call with Attorney Curtis conferring on motion for partial summary judgment. Interoffice conference with Attorney Schroeder to discuss conferral and strategy for oral arguments on motion.	0.40	\$180.00	\$72.00
9/23/14	MES	Instruct Attorney Colley to contact Attorney Thenell's office to confer on motion for partial summary judgment. Interoffice conference with Attorney Colley to discuss Attorney Curtis' unavailability. Review and revise Attorney Colley's draft e-mail to Attorney Curtis requesting time to confer on motion and basis for motion. Interoffice conference with Attorney Colley to discuss his telephone conference with Attorney Curtis to confer on motion for partial summary judgment and MetLife's refusal to stipulate that MetLife breached its policy of insurance to Mrs. Beck. Final and file motion for partial summary judgment and documents in support with the court.	1.20	\$290.00	\$348.00
9/23/14	MBM	Review and revise motion for partial summary judgment. Interoffice conference with Attorney Schroeder to discuss same.	0.60	\$375.00	\$225.00
9/24/14	MDC	Interoffice conference with Attorney Schroeder to plan strategy for expert depositions and identify steps to implement same.	0.30	\$180.00	\$54.00
9/24/14	CHG	Review e-mail from Attorney Schroeder on summary judgment motion she is filing on breach and fees issues. Confer with Attorney Schroeder about upcoming depositions of experts.	0.65	\$395.00	\$256.75
9/26/14	MDC	Interoffice conference with Attorney Schroeder concerning strategy for deposition of MetLife's expert. Review and respond to multiple e-mails concerning same.	0.40	\$180.00	\$72.00
9/29/14	MES	Review witness fee checks and subpoenas received from Attorney Thenell's office. Instruct Attorney Colley to contact Attorney Thenell's office to confirm amount owed to Mr. Omundson for witness fee. Instruct Legal Assistant Abbott to draft Acceptance of Service for subpoenas to MetLife's expert. Review and execute letter to Attorney Thenell enclosing same.	0.35	\$290.00	\$101.50
10/6/14	MDC	Multiple telephone calls with Attorney Curtis to follow up on production of expert's file in response to subpoena duces tecum. Interoffice conference with Attorney Schroeder to discuss same. E-mail to Attorney Curtis concerning same. Coordinate cloud delivery of electronic version of Mr. Omundson's file.	1.20	\$180.00	\$216.00
10/6/14	MDC	Interoffice conference with Attorney Schroeder concerning preparations for upcoming expert depositions. Prepare outline of issues for same.	0.70	\$180.00	\$126.00
10/6/14	MES	Telephone conferences with Mr. Moreland and Mr. Eggert concerning MetLife's request that they produce their files at their depositions on Wednesday.	0.30	\$290.00	\$87.00
10/6/14	MDC	Telephone calls with Mr. Eggert and Mr. Moreland concerning preparations for upcoming expert depositions.	0.20	\$180.00	\$36.00
10/6/14	MBM	Conference with Attorney Schroeder regarding discovery question and expert witness issues.	0.20	\$375.00	\$75.00
10/7/14	MDC	Telephone conference and several interoffice conferences with Attorney Schroeder to discuss strategy and preparation for upcoming expert depositions.	0.60	\$180.00	\$108.00
10/8/14	MDC	Several interoffice conferences with Attorney Schroeder to discuss status of our expert witnesses' depositions, as well as to strategize for upcoming deposition of MetLife expert witness. Interoffice conference with Attorney Greenwood to discuss same and the next steps in litigation.	0.60	\$180.00	\$108.00
10/9/14	MDC	Interoffice conference with Attorney Schroeder to prepare for deposition of MetLife's expert.	0.35	\$180.00	\$63.00
10/14/14	MDC	Review Judge Acosta's Opinion and Order denying MetLife's motion to compel. Discuss same with Attorney Schroeder.	0.10	\$180.00	\$18.00

Date	Timekeeper	Description	Hours	Rate	Amount
10/17/14	MES	Review court notices confirming MetLife filed a response to Mrs. Beck's motion for partial summary judgment. Interoffice conferences with Attorneys Colley and Greenwood to discuss MetLife's response brief.	1.15	\$290.00	\$333.50
10/17/14	MDC	Analyze arguments and supporting authority in MetLife's response to motion for partial summary judgment. Interoffice conference with Attorney Schroeder to discuss same and to plan strategy for Reply brief.	1.10	\$180.00	\$198.00
10/17/14	CHG	Review MetLife's Response to motion for partial summary judgment. Confer with Attorney Schroeder on same.	0.90	\$395.00	\$355.50
10/21/14	CHG	Confer with Attorney Schroeder on status of Reply brief.	0.30	\$395.00	\$118.50
10/22/14	MES	Review and revise Reply brief drafted by Attorney Colley.	2.85	\$290.00	\$826.50
10/22/14	MDC	Interoffice conferences with Attorney Schroeder concerning areas to revise and supplement in Reply brief in support of motion for partial summary judgment.	0.50	\$180.00	\$90.00
10/23/14	MDC	Review current draft of Reply in support of motion for partial summary judgment. Review supporting declarations and exhibits of same. Interoffice conference with Attorney Schroeder concerning same.	0.50	\$180.00	\$90.00
10/23/14	MDC	Legal research into District of Oregon and Ninth Circuit case law concerning sanctions for spoliation of evidence to aid revisions to Reply in support of motion for partial summary judgment. Interoffice conference with Attorney Schroeder to discuss same.	1.30	\$180.00	\$234.00
10/24/14	MES	Interoffice conference with Attorney Merchant to discuss whether to withdraw oral argument request. E-mail to Attorney Curtis asking whether MetLife will agree to withdraw its request for oral argument. Review voicemail message and e-mail from Attorney Curtis consenting to same.	0.75	\$290.00	\$217.50
10/24/14	MBM	Conference with Attorney Schroeder regarding waiver of request for oral argument.	0.20	\$375.00	\$75.00
10/29/14	MDC	Interoffice conference with Attorney Schroeder to confer on response to MetLife's motion for partial summary judgment and discuss timing issues for filing cross-motion for summary judgment.	0.30	\$180.00	\$54.00
10/29/14	MES	Legal research concerning possible arguments for cross-motion in the event MetLife files a motion for partial summary judgment that Mrs. Beck is not entitled to recover RCV. Interoffice conference with Attorney Colley to discuss same.	0.45	\$290.00	\$130.50
10/29/14	MES	Review file for any evidence that MetLife waived the one-year deadline. Interoffice conference with Attorney Colley to confirm no waiver and to discuss additional arguments in support of Response and Cross-Motion.	0.75	\$290.00	\$217.50
10/29/14	MDC	Review MetLife's motion for partial summary judgment. Interoffice conference with Attorney Schroeder to discuss Response in opposition to same.	0.70	\$180.00	\$126.00
10/30/14	MDC	Telephone conference with Attorney Schroeder to discuss final revisions to Response to MetLife's motion for partial summary judgment.	0.20	\$180.00	\$36.00
10/31/14	MES	Consider whether we should withdraw Mrs. Beck's cross-motion for partial summary judgment in order to prevent MetLife from having an opportunity to supplement the record in response to her motion for partial summary judgment. Interoffice conference with Attorney Merchant to discuss same.	0.40	\$290.00	\$116.00
11/3/14	MDC	Interoffice conference with Attorney Schroeder to analyze current status of dispositive motions and evaluate methods for moving case forward.	0.30	\$180.00	\$54.00
11/4/14	MES	Interoffice conference with Attorney Colley to discuss reasons in favor of withdrawing cross-motion for partial summary judgment. Interoffice conference with Attorney Merchant to	1.35	\$290.00	\$391.50

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Date	Timekeeper	Description	Hours	Rate	Amount
		discuss same. Draft Notice of Withdrawal. Forward same to Attorney Merchant for review and comment. Revise Notice to incorporate Attorney Merchant's suggested edits. Forward final Notice to Mrs. Beck for review and approval.			
11/4/14	MBM	Conference with Attorney Schroeder regarding withdrawal of cross-motion. Review and edit draft notice concerning same.	0.20	\$375.00	\$75.00
11/5/14	MES	Voicemail message for Mrs. Beck to discuss plan to withdraw her cross-motion for partial summary judgment. Interoffice conference with Attorney Greenwood to discuss same.	0.20	\$290.00	\$58.00
11/6/14	MDC	Review MetLife's Reply in support of its motion for partial summary judgment. Interoffice conference with Attorney Schroeder to discuss impact of Reply on case strategy.	0.40	\$180.00	\$72.00
11/6/14	MES	Review Reply brief filed by MetLife and declaration of Attorney Thenell in support. Interoffice conference with Attorney Colley to discuss same. E-mail to Mrs. Beck concerning same.	0.45	\$290.00	\$130.50
11/21/14	MES	Interoffice conference with Attorney Greenwood to discuss case status and next steps.	0.20	\$290.00	\$58.00
12/12/14	CMW	Interoffice conference with Attorney Schroeder regarding background of case, focusing on current status of litigation, expectations for timeline and next steps in litigation, damage to property, and numerous changes to estimates for repair. Review litigation file for relevant background information.	1.70	\$180.00	\$306.00
2/19/15	MES	Review e-mail concerning Mrs. Beck's frustration with the court's delay in ruling on her motion for partial summary judgment. Interoffice conference with Attorneys Roy and Greenwood to discuss draft response to same. Revise and send e-mail that we need to continue to wait patiently for Judge Acosta's ruling.	0.80	\$300.00	\$240.00
3/17/15	MES	Interoffice conference with Attorney Greenwood to discuss case status. Interoffice conference with Attorney Merchant to discuss strategy for follow-up with the court. Detailed e-mail to Attorney Greenwood concerning same.	0.40	\$300.00	\$120.00
3/17/15	MBM	Interoffice conference with Attorney Schroeder regarding delay in decision and how to approach court regarding same.	0.25	\$375.00	\$93.75
3/18/15	MES	Interoffice conference with Attorney Merchant to discuss next steps. E-mail to client concerning same.	0.15	\$300.00	\$45.00
3/26/15	MBM	Interoffice conference with Attorney Schroeder regarding case status and need to set trial date to keep moving.	0.20	\$375.00	\$75.00
3/27/15	MDC	Interoffice conference with Attorney Schroeder concerning strategy for making formal request for trial date or raising issue with opposing counsel.	0.20	\$190.00	\$38.00
3/27/15	MES	Interoffice conferences with Attorneys Colley and Greenwood to discuss the pros and cons of requesting a trial date now.	0.40	\$300.00	\$120.00
3/31/15	MES	Interoffice conferences with Attorneys Reilly and Greenwood concerning decision to wait to request a trial date. Detailed e-mail to Mrs. Beck concerning same.	0.35	\$300.00	\$105.00
4/9/15	MES	Interoffice conference with Attorney Merchant to discuss draft joint letter to Judge Acosta. E-mail to Attorneys Thenell and Curtis enclosing same for review and comment. Review and respond to e-mail from Attorney Curtis approving same and arranging for pick-up of same tomorrow morning.	0.20	\$300.00	\$60.00
4/21/15	MDC	Interoffice conference with Attorney Schroeder to confer on pursuing increased construction costs.	0.20	\$190.00	\$38.00
4/27/15	MDC	Interoffice conference with Attorney Schroeder to evaluate alternative methods for speeding up decision time on pending motions for summary judgment.	0.30	\$190.00	\$57.00
4/29/15	MES	Interoffice conference with Attorney Greenwood to discuss legal research concerning Mrs. Beck's question about increased construction costs and proposed recommendation to Mrs. Beck.	0.20	\$300.00	\$60.00

Date	Timekeeper	Description	Hours	Rate	Amount
5/1/15	MDC	Interoffice conference with Attorney Schroeder to evaluate potential avenues for shortening time to receive decision on motion for partial summary judgment.	0.30	\$190.00	\$57.00
5/8/15	MDC	Interoffice conference with Attorney Schroeder concerning strategy related to court's decision on motions for partial summary judgment.	0.20	\$190.00	\$38.00
6/11/15	CHG	Telephone conference with Mrs. Beck on status. Agree that a gentle reminder letter be sent to Judge Acosta. Confer with Attorney Schroeder on same to discuss the need to prepare form of reminder letter to Judge Acosta.	0.65	\$405.00	\$263.25
6/18/15	CHG	Telephone conference with Mrs. Beck on status and to discuss filing additional letter with Judge Acosta on client's age and concerns that matter be resolved before her health declines. Confer with Attorney Schroeder on same.	0.30	\$405.00	\$121.50
6/23/15	MES	Interoffice conference with Attorney Greenwood to discuss and draft formal letter to Judge Acosta. E-mail same to Mr. Gale and Attorney Thenell along with a copy of the parties' joint April 13, 2015 letter. E-mail to Mrs. Beck concerning same.	1.45	\$300.00	\$435.00
6/23/15	CHG	Confer with Attorney Schroeder on form of letter requesting guidance on how to move the resolution of the case forward given plaintiff's age and health concerns.	1.00	\$405.00	\$405.00
7/7/15	MES	Review e-mails concerning Judge Acosta's Opinion and Order. Review Opinion and Order. Several telephone conferences with Attorneys Greenwood and Colley concerning same.	0.85	\$300.00	\$255.00
7/7/15	CHG	Review in detail grant of summary judgment. Telephone conference with Mrs. Beck to discuss same and ramifications for case going forward. Telephone conference with Attorney Schroeder to discuss Judge Acosta's Order and to suggest that she take steps to obtain earliest trial setting possible.	1.95	\$405.00	\$789.75
7/8/15	MES	Interoffice conference with Attorneys Merchant and Colley to discuss Judge Acosta's Opinion and Order and preparations needed for trial.	0.45	\$300.00	\$135.00
7/8/15	MDC	Interoffice conference with Attorney Schroeder to discuss strategy for raising settlement issue and evidentiary issues for trial.	0.20	\$190.00	\$38.00
7/8/15	CHG	Review with care Judge Acosta's written opinion granting summary judgment. Confer with Attorney Schroeder on same to discuss next steps to either force settlement or try remaining issue as soon as possible given client's age and age of the case.	1.40	\$405.00	\$567.00
7/8/15	MES	Interoffice conference with Attorney Greenwood to discuss trial and settlement strategy.	0.20	\$300.00	\$60.00
7/9/15	MES	Interoffice conference with Attorney Greenwood to discuss Mrs. Beck's position with regard to settlement and trial.	0.25	\$300.00	\$75.00
7/9/15	CHG	Confer with Attorney Schroeder on Judge Acosta's ruling. Recommend she apply to court for earliest possible trial date.	0.35	\$405.00	\$141.75
7/10/15	CHG	Confer with Attorney Schroeder on Mrs. Beck's request for early trial setting and trial and settlement strategy.	1.20	\$405.00	\$486.00
7/15/15	MES	Interoffice conference with Attorney Greenwood to discuss preparations needed for trial scheduling conference.	0.20	\$300.00	\$60.00
7/15/15	MBM	Conference with Attorney Schroeder concerning upcoming trial scheduling conference.	0.20	\$375.00	\$75.00
7/27/15	CHG	Confer with Attorney Schroeder on Attorney Thenell's view of Judge Acosta's recent ruling.	0.45	\$405.00	\$182.25
7/28/15	CHG	Confer with Attorney Schroeder on trial scheduling conference and earliest possible trial date.	0.40	\$405.00	\$162.00
7/29/15	CHG	Confer with Attorney Schroeder on results of court conference, December 7, 2015 trial date and preparations needed for same.	0.45	\$405.00	\$182.25

Date	Timekeeper	Description	Hours	Rate	Amount
7/31/15	MES	Review e-mail from Attorney Thenell requesting mediation as soon as possible. Telephone conference with Mrs. Beck and interoffice conferences with Attorneys Greenwood and Merchant to discuss same. Instruct Legal Assistant Fleskes to contact Attorney Scott's office for his availability. E-mail to colleagues for recommendations for mediator. Interoffice conference with Attorney Merchant to discuss same.	1.35	\$300.00	\$405.00
7/31/15	CHG	Long telephone conference with Mrs. Beck to discuss case status and next steps. Review e-mail from Attorney Schroeder concerning MetLife's request to participate in mediation. E-mail to Mrs. Beck concerning same.	1.40	\$405.00	\$567.00
8/10/15	MES	Interoffice conference with Attorney Greenwood to discuss mediation strategy.	0.20	\$300.00	\$60.00
8/11/15	CHG	Confer with Attorney Schroeder on spreadsheet needed for use in pre-mediation meeting with Mrs. Beck. Review and revise draft spreadsheet. Interoffice conference with Attorney Schroeder to discuss same.	1.85	\$405.00	\$749.25
8/12/15	MBM	Interoffice conference with Attorney Schroeder regarding case valuation.	0.40	\$375.00	\$150.00
8/12/15	MES	Interoffice conference with Attorney Greenwood to discuss mediation strategy.	1.30	\$300.00	\$390.00
8/13/15	MES	Interoffice conference with Attorney Schroeder regarding settlement strategy.	0.30	\$300.00	\$90.00
8/13/15	MES	Interoffice conference with Attorney Greenwood to discuss mediation strategy.	1.00	\$300.00	\$300.00
8/17/15	MES	Interoffice conference with Attorney Greenwood to discuss information needed for pre-mediation meeting with Mrs. Beck.	0.80	\$300.00	\$240.00
8/20/15	CHG	Review of draft Excel document on various settlement proposals. Confer with Attorney Schroeder to provide comments on same. Review redraft. Prepare comments on redraft.	1.15	\$405.00	\$465.75
8/20/15	MES	Review briefing on plaintiff's motions to quash the deposition subpoenas issued by Metropolitan to Mr. Greenwood and Mr. Shook. Review transcript of June 16, 2014 hearing in which Judge Acosta granted both motions. Draft section in mediation statement concerning same.	2.10	\$300.00	\$630.00
8/21/15	CHG	Confer with Attorney Schroeder on simplifying Excel presentation for Mrs. Beck. Review e-mail from Attorney Schroeder on time for meeting with Mrs. Beck to go over options to prepare her for the mediation.	0.85	\$405.00	\$344.25
8/21/15	MES	Interoffice conference with Attorney Greenwood to discuss edits needed to spreadsheet.	0.30	\$300.00	\$90.00
8/24/15	CHG	Review spreadsheet. Confer with Attorney Schroeder on changes to simple presentation. Draft letter of explanation on case status and explaining spreadsheet to client in preparation for meeting on upcoming mediation.	2.10	\$405.00	\$850.50
8/26/15	MBM	Review and edit mediation statement and conference with Attorney Schroeder regarding same.	0.75	\$375.00	\$281.25
8/27/15	CHG	Review mediation statement with care. Prepare suggested revisions to same. Confer with Attorney Schroeder on edits and reasoning. Review final mediation statement and attachments.	1.65	\$405.00	\$668.25
8/27/15	MES	Forward final draft mediation statement to Attorney Greenwood for final review and comment. Interoffice conference with Attorney Greenwood to discuss his suggested edits to same.	0.95	\$300.00	\$285.00
8/28/15	CHG	Confer with Attorney Schroeder on final preparations for mediation.	0.95	\$405.00	\$384.75
8/31/15	MDC	Interoffice conference and telephone conference with Attorney Schroeder to discuss research project related to Metropolitan's assertions at mediation.	0.40	\$190.00	\$76.00

Date	Timekeeper	Description	Hours	Rate	Amount
8/31/15	CHG	Confer with Attorney Schroeder on strategy moving forward now that mediation failed to produce a settlement.	0.80	\$405.00	\$324.00
8/31/15	MES	Interoffice conference with Attorney Greenwood to discuss next steps post-mediation.	0.60	\$300.00	\$180.00
8/31/15	MES	Interoffice conference with Attorney Colley to discuss legal research needed for anticipated motions in limine.	0.40	\$300.00	\$120.00
9/1/15	MDC	Interoffice conference with Attorney Schroeder to evaluate potential responses to settlement communications from Attorney Thenell and Mediator Scott.	0.40	\$190.00	\$76.00
9/2/15	MES	Interoffice conference with Attorney Greenwood to discuss Attorney Thenell's settlement offer and arguments for response to same.	0.35	\$300.00	\$105.00
9/10/15	MES	Review e-mail from Attorney Thenell concerning proposed subpoena to Mrs. Beck's insurance agent. Interoffice conference with Attorneys Reilly and Colley concerning same.	0.45	\$300.00	\$135.00
9/10/15	MES	Review additional documents received from Attorney Thenell concerning Ms. Sailor. Interoffice conference with Attorney Greenwood to discuss same.	0.80	\$300.00	\$240.00
9/10/15	MDC	Interoffice conference with Attorney Schroeder concerning opposing counsel's request to conduct additional discovery in this matter and appropriate response thereto.	0.20	\$190.00	\$38.00
9/10/15	MDC	Additional legal research concerning statute of limitations issue. Interoffice conference with Attorney Schroeder to discuss same.	0.40	\$190.00	\$76.00
9/11/15	MES	Interoffice conference with Attorney Merchant to discuss Attorney Thenell's subpoena request and suggested response to same.	0.45	\$300.00	\$135.00
9/11/15	MBM	Conference with Attorney Schroeder regarding defendant's discovery request.	0.20	\$375.00	\$75.00
9/14/15	MES	Interoffice conference with Attorney Greenwood to discuss the outcome of oral argument, Attorney Thenell's arguments and the court's response to same, and strategy for next steps.	0.60	\$300.00	\$180.00
9/14/15	MDC	Interoffice conference with Attorney Schroeder to discuss next steps following denial of defendant's motion to conduct additional discovery and analysis of RCV claim.	0.50	\$190.00	\$95.00
9/14/15	MES	Interoffice conference with Attorney Colley to discuss statute of limitations issues.	0.70	\$300.00	\$210.00
9/14/15	CHG	Confer with Attorney Schroeder on argument over Attorney Thenell's late discovery request and the court's ruling. Telephone conference with Mrs. Beck on same and case status.	0.45	\$405.00	\$182.25
9/22/15	MDC	Review defendant's Offer of Judgment. Interoffice conference with Attorney Schroeder to evaluate same and discuss response.	0.20	\$190.00	\$38.00
9/23/15	MES	Continue legal research concerning the possible application of Rule 68 to this case. Detailed e-mail to Attorneys Greenwood and Merchant concerning my legal analysis and recommendations for their review and comment.	2.35	\$300.00	\$705.00
9/28/15	MES	Interoffice conference with Attorney Greenwood to discuss Mrs. Beck's rejection of MetLife's Offer of Judgment and additional evidence needed for trial.	0.45	\$300.00	\$135.00
9/30/15	MDC	Interoffice conference with Attorney Schroeder concerning ability to obtain information in related suit against MetLife.	0.20	\$190.00	\$38.00
10/5/15	MBM	Conference with Attorney Schroeder regarding federal jury instructions.	0.10	\$375.00	\$37.50
10/16/15	MBM	Conference with Attorney Schroeder regarding potential attorney fee expert.	0.30	\$375.00	\$112.50
10/22/15	MDC	Interoffice conference with Attorney Schroeder to discuss motions in limine. Begin drafting same.	1.60	\$190.00	\$304.00

Date	Timekeeper	Description	Hours	Rate	Amount
10/23/15	MDC	Interoffice conference with Attorney Schroeder to plan trial strategy and discuss documents to be filed pursuant to the court's Jury Trial Management Order.	1.80	\$190.00	\$342.00
10/23/15	MDC	Legal research on ability of party to subpoena opposing party's non-testifying expert to trial. Interoffice conference with Attorney Schroeder concerning research results.	0.9	\$190.00	\$171.00
10/23/15	MES	Draft e-mails to Attorneys Bragg and Thenell. Review follow-up from Attorney Thenell. Forward same to Attorney Merchant. Several follow-up e-mails with Attorney Merchant concerning Attorney Thenell's response.	1.35	\$300.00	\$405.00
10/27/15	MBM	Assist Attorney Schroeder with jury instructions and Trial Brief.	1.50	\$375.00	\$562.50
10/28/15	MDC	Telephone conference with Attorney Schroeder concerning strategy for motions in limine. Review relevant rules of evidence to aid in drafting of motions in limine and begin drafting same.	0.90	\$190.00	\$171.00
10/29/15	MES	Re-review defendant's claim notes to confirm whether they should be used as evidence. Interoffice conference with Attorney Colley to discuss evidence therein in support of plaintiff's motion in limine with regard to Mr. Shook.	0.40	\$300.00	\$120.00
10/29/15	MES	Review Attorney Merchant's suggested edits to jury instructions. Interoffice conference with Attorney Merchant to discuss same. Revise jury instructions to incorporate Attorney Merchant's suggested edits.	2.30	\$300.00	\$690.00
10/29/15	MDC	Interoffice conference with Attorney Schroeder concerning effect of statements made by Mr. Funk regarding negotiated settlement figures and other issues regarding valuation.	0.40	\$190.00	\$76.00
10/29/15	MDC	Interoffice conference with Attorney Merchant to discuss law of the case with regard to Metropolitan's affirmative defenses related to RCV.	0.50	\$190.00	\$95.00
10/29/15	MDC	Interoffice conference with Attorney Schroeder to discuss evidentiary issues.	0.30	\$190.00	\$57.00
10/30/15	MDC	Revise voir dire questions. Interoffice conference with Attorney Merchant concerning same.	0.40	\$190.00	\$76.00
11/2/15	MES	Review and respond to Attorney Thenell's proposed edits to the statement of the case. Interoffice conference with Attorney Merchant concerning same.	1.15	\$300.00	\$345.00
11/2/15	MDC	Legal research concerning jury instruction on breach and on issues already decided on summary judgment. Interoffice conference with Attorney Schroeder to discuss research results.	1.20	\$190.00	\$228.00
11/2/15	MBM	Assist in trial preparation. Conference with Attorneys Schroeder and Colley to discuss same.	2.60	\$375.00	\$975.00
11/3/15	MDC	Interoffice conference with Attorney Schroeder concerning supporting evidence and proposed verdict form language.	0.30	\$190.00	\$57.00
11/3/15	MDC	Review and comment on Response to Defendant's Objections to Plaintiff's Proposed Jury Instructions and Opposition to Defendant's Additional Proposed Instruction. Interoffice conference with Attorney Schroeder concerning same.	0.90	\$190.00	\$171.00
11/3/15	MES	Review Metropolitan's witness list. Interoffice conferences with Attorney Merchant and Attorney Colley to discuss Metropolitan's pre-trial filings and objections to same.	0.60	\$300.00	\$180.00
11/3/15	MDC	Telephone conference with Attorney Schroeder to plan responses to defendant's filings.	0.30	\$190.00	\$57.00
11/4/15	MDC	Telephone conference with Attorney Schroeder to evaluate whether to seek disqualification of defendant's expert witness. E-mail to Attorney Warren and interoffice conferences with Attorney Warren concerning same.	1.20	\$190.00	\$228.00

Date	Timekeeper	Description	Hours	Rate	Amount
11/4/15	BEW	Interoffice conference with Attorney Colley to discuss research needs. Begin research into Federal of Civil Procedure 36 and disqualification of expert. Update Attorney Colley with preliminary research and findings. Review Metropolitan's response to Request for Admissions.	3.15	\$230.00	\$724.50
11/4/15	CHG	Interoffice conference with Attorney Schroeder on status of trial preparations.	0.45	\$405.00	\$182.25
11/5/15	MDC	Interoffice conference with Attorney Schroeder concerning objections, Motions in Limine, and Daubert challenge to defendant's expert.	0.40	\$190.00	\$76.00
11/5/15	BEW	Continue research into withdrawal of admissions under Federal Rule Civil Procedure 36. Interoffice conference with Attorney Schroeder to discuss research and requirements for withdrawing admissions.	3.15	\$230.00	\$724.50
11/5/15	MBM	Trial preparation assistance. Review filings and confer with Attorneys Schroeder and Colley concerning same.	1.25	\$375.00	\$468.75
11/6/15	MDC	Interoffice conference with Attorney Schroeder concerning response to Defendant's Motion to Continue Trial Date.	0.70	\$190.00	\$133.00
11/6/15	MDC	Outline objections to Defendant's Motion to Continue Trial Date. Interoffice conference with Attorney Schroeder to discuss same.	0.50	\$190.00	\$95.00
11/6/15	MBM	Interoffice conference with Attorney Schroeder to discuss and revise memorandum in opposition to Metropolitan's motion to setover the trial date.	0.75	\$375.00	\$281.25
11/9/15	MDC	Interoffice conference with Attorney Schroeder to discuss additional work needed for response briefs.	0.60	\$190.00	\$114.00
11/9/15	MES	Interoffice conference with Attorney Merchant to discuss Plaintiff's Motions in Limine. Revise same to incorporate Attorney Merchant's suggested edits. Instruct Legal Assistant Abbott to final and file same with the court.	0.80	\$300.00	\$240.00
11/9/15	MES	Continue reviewing and revising Plaintiff's Objections to Defendant's Proposed Exhibits. Forward same to Attorney Merchant for review and comment. Interoffice conference with Attorney Merchant to discuss same. Revise draft to incorporate Attorney Merchant's suggested edits. Instruct Legal Assistant Abbott to final and file same with the court.	1.85	\$300.00	\$555.00
11/9/15	MES	Begin reviewing defendant's filings. Interoffice conference with Attorney Colley to discuss same.	0.45	\$300.00	\$135.00
11/10/15	CHG	Confer with Attorney Schroeder on her meeting with Mrs. Beck and case status.	0.25	\$405.00	\$101.25
11/11/15	MDC	Interoffice conference with Attorney Schroeder concerning subpoena to Mr. McCabe.	0.10	\$190.00	\$19.00
11/11/15	MDC	Interoffice conference with Attorney Schroeder to strategize response to trial subpoenas issued to Ms. Sailor.	0.30	\$190.00	\$57.00
11/12/15	MES	Interoffice conference with Attorney Colley to discuss legal research needed and additional arguments for reply briefs due on Monday.	0.55	\$300.00	\$165.00
11/12/15	MDC	Interoffice conference with Attorney Schroeder to discuss plan for reply filings and allocate briefing tasks.	0.30	\$190.00	\$57.00
11/13/15	MDC	Interoffice conference with Attorney Schroeder to discuss case strategy.	0.50	\$190.00	\$95.00
11/13/15	CHG	Confer with Attorney Schroeder on status and new matching exception Attorney Thenell is trying to insert into the case.	0.65	\$405.00	\$263.25
11/14/15	MES	Interoffice conference with Attorney Colley to discuss his legal research results on matching issue.	0.70	\$300.00	\$210.00
11/16/15	MDC	Multiple interoffice conferences with Attorney Schroeder concerning revisions to reply filings and case strategy.	0.60	\$190.00	\$114.00
11/16/15	MDC	Interoffice conference with Attorney Schroeder concerning subpoena issues.	0.20	\$190.00	\$38.00

Date	Timekeeper	Description	Hours	Rate	Amount
11/17/15	MDC	Interoffice conference with Attorney Schroeder concerning strategy with regard to Mr. Omundson.	0.40	\$190.00	\$76.00
11/18/15	MES	Interoffice conference with Attorney Curtis to discuss trial subpoenas to Mr. Lawson and Mr. Funk, her agreement to accept service of same, and her agreement that the mileage fees can be calculated from her office.	0.15	\$300.00	\$45.00
11/18/15	MDC	Interoffice conference with Attorney Schroeder concerning issues for voir dire.	0.40	\$190.00	\$76.00
11/18/15	MES	Interoffice conference with Attorney Greenwood to discuss my telephone conference with Mr. Shook.	0.20	\$300.00	\$60.00
11/18/15	MES	Interoffice conference with Attorney Colley to discuss trial strategy and additional preparations needed for trial.	0.60	\$300.00	\$180.00
11/18/15	MDC	Interoffice conference with Attorney Schroeder to confer on witness strategy and appropriate response to Metropolitan subpoena.	0.60	\$190.00	\$114.00
11/20/15	MBM	Conference with Attorney Schroeder regarding Sailor subpoena issue.	0.40	\$375.00	\$150.00
11/20/15	MES	Interoffice conference with Attorney Colley to discuss arguments for next week's pre-trial conference and additional legal research needed.	0.55	\$300.00	\$165.00
11/20/15	MDC	Interoffice conference with Attorney Schroeder concerning deposition and testimony of Mr. Nickle.	0.40	\$190.00	\$76.00
11/25/15	MDC	Interoffice conference with Attorney Schroeder to discuss strategy for presenting ACV and RCV at trial as well as preparation for deposition of Mr. Nickle.	0.30	\$190.00	\$57.00
11/30/15	MES	Interoffice conference with Attorneys Colley and Greenwood to discuss admissions made by Mr. Nickle during his deposition.	0.35	\$300.00	\$105.00
11/30/15	MDC	Review Judge Acosta's Order on the parties' Motions in Limine. Telephone conference with Attorney Schroeder to discuss same and plan next steps.	0.60	\$190.00	\$114.00
12/1/15	MES	Interoffice conference with Attorney Merchant to discuss Mr. Nickle's deposition testimony and trial strategy.	0.40	\$300.00	\$120.00
12/1/15	MES	Interoffice conference with Attorney Colley to discuss objections to Metropolitan's Amended Witness List. Instruct Attorney Colley to draft formal objections for filing with the court.	0.55	\$300.00	\$165.00
12/1/15	MBM	Conference with Attorney Schroeder regarding recent deposition, trial strategy and impact of the court's recent ruling.	0.60	\$375.00	\$225.00
12/2/15	MBM	Multiple conferences with Attorneys Schroeder and Colley regarding final trial preparations and strategy, settlement strategy, and themes for trial.	2.50	\$375.00	\$937.50
12/2/15	MES	Interoffice conference with Attorneys Merchant and Greenwood to discuss Metropolitan's settlement offer and Mrs. Beck's counter-settlement offer.	0.60	\$300.00	\$180.00
12/2/15	MES	Interoffice conference with Attorney Merchant to discuss Attorney Thenell's position that Mrs. Beck is not entitled to recover any ACV above her policy limits.	0.40	\$300.00	\$120.00
12/2/15	MES	Review Attorney Thenell's e-mail response and increased settlement offer. Interoffice conference with Attorney Merchant to discuss same.	0.75	\$300.00	\$225.00
12/2/15	MDC	Conference with Attorney Schroeder to discuss objections and trial matters.	0.20	\$190.00	\$38.00
12/2/15	MDC	Several interoffice conferences with Attorney Schroeder concerning settlement offer from defendant and to discuss possible counteroffer.	0.50	\$190.00	\$95.00
12/2/15	MDC	Review settlement correspondence between the parties. Interoffice conference with Attorney Schroeder to discuss strategy for further settlement discussions.	1.00	\$190.00	\$190.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/3/15	MES	Interoffice conference with Attorney Colley to discuss limiting jury instruction on Metropolitan's other payments.	0.35	\$300.00	\$105.00
12/3/15	MES	Consider whether a limiting instruction is needed with regard to matching. Interoffice conference with Attorney Colley to discuss same.	0.30	\$300.00	\$90.00
12/3/15	MDC	Interoffice conference with Attorney Schroeder to discuss which matters to raise with the court prior to voir dire.	0.20	\$190.00	\$38.00
12/3/15	MES	Interoffice conference with Attorney Merchant to discuss planned request for clarification from Judge Acosta concerning Coverage A Plus.	0.30	\$300.00	\$90.00
12/3/15	MDC	Review pattern jury instructions from state and federal court for models on instructions involving other payments by insurers. Draft additional proposed jury instruction regarding other payments and motion for same. Interoffice conference with Attorney Schroeder concerning proposed additional jury instruction.	1.20	\$190.00	\$228.00
12/3/15	MES	Telephone conference with Attorney Merchant to discuss best response to Metropolitan's latest settlement offer. Follow-up telephone conference with Mrs. Beck to discuss same.	0.55	\$300.00	\$165.00
12/3/15	MDC	Interoffice conference with Attorney Schroeder concerning response to defendant's most recent settlement counteroffer.	0.40	\$190.00	\$76.00
12/3/15	MES	Interoffice conference with Attorney Merchant to discuss trial strategy.	0.30	\$300.00	\$90.00
12/3/15	MDC	Interoffice conference with Attorney Merchant concerning preparations for trial.	0.30	\$190.00	\$57.00
12/4/15	MDC	Review and analyze response from Metropolitan concerning Mr. Nickle's testimony and interpretation of Coverage A Plus provisions. Interoffice conference with Attorney Schroeder to prepare response to same.	0.40	\$190.00	\$76.00
12/4/15	MES	Review e-mail from Judge Acosta with his rulings on matching, Coverage A Plus, and Mr. Nickle. Forward same to Mrs. Beck. Interoffice conference with Attorney Merchant to discuss same.	0.60	\$300.00	\$180.00
12/5/15	MES	Review e-mail from Attorney Curtis asking whether plaintiff will agree to call each of Metropolitan's witnesses (Mr. Lawson, Mr. Funk, and Mr. McCabe) only once rather than limiting cross-examination to the scope of plaintiff's direct examination and forcing Metropolitan to re-call these witnesses in its case in chief. Consider pros and cons to this approach. Interoffice conference with Attorney Merchant to discuss same.	0.30	\$300.00	\$90.00
12/6/15	MBM	Assist with final trial preparations. Evaluate response to Attorney Curtis' witness order question. Interoffice conference with Attorney Schroeder to discuss same. Review and revise proposed jury instruction on other payments. Forward same to Attorney Schroeder with comments.	2.00	\$375.00	\$750.00
12/7/15	MDC	Telephone conference with Attorney Schroeder concerning issues in defendant's opening statement. Review unredacted expert reports by Mr. Omundson and e-mail to Attorney Schroeder concerning same.	0.40	\$190.00	\$76.00
12/7/15	MDC	Interoffice conference with Attorney Schroeder to plan strategy for next day's witness testimony.	1.30	\$190.00	\$247.00
12/7/15	MDC	Interoffice conference with Attorney Schroeder concerning strategy and potential revisions to closing argument in light of defense theme.	0.40	\$190.00	\$76.00
12/7/15	MBM	Conference with Attorney Schroeder to assist with next day's evidence.	0.50	\$375.00	\$187.50
12/7/15	MDC	Review Judge Acosta's jury instructions to aid preparation for argument on same and compare to plaintiff's proposed jury instructions. Interoffice conference with Attorney Schroeder concerning same.	1.60	\$190.00	\$304.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/8/15	MDC	Conference with Attorney Schroeder and Expert Moreland concerning Mr. Moreland's testimony, as well as planning for final cross-examination of Mr. Funk and testimony of Mr. Eggert.	0.50	\$190.00	\$95.00
12/8/15	MDC	Interoffice conference with Attorney Schroeder to prepare for day three of trial.	1.10	\$190.00	\$209.00
12/8/15	MES	Interoffice conference with Attorney Reilly to discuss issue of when Mr. Moreland's estimate was provided to Metropolitan. Several follow-up e-mails with Attorney Reilly concerning same. Review Metropolitan's log notes and confirm that Mr. Funk acknowledged receiving Mr. Moreland's report in his July 23, 2012 log note. Consider how best to raise this issue with the court.	0.85	\$300.00	\$255.00
12/8/15	MBM	Multiple conferences with Attorney Schroeder and Attorney Colley regarding trial issues and questions. Evaluate lawyer as witness question. Interoffice conference with Attorney Schroeder to discuss same.	2.50	\$375.00	\$937.50
12/9/15	MDC	Interoffice conference with Attorney Schroeder concerning assistance needed for third day of trial.	0.40	\$190.00	\$76.00
12/9/15	MDC	Telephone conference with Attorney Schroeder concerning additional jury instructions.	0.40	\$190.00	\$76.00
12/9/15	MDC	Review settlement offer from defendant. Exchange multiple e-mails with Attorney Schroeder and Attorney Merchant concerning response to same.	0.20	\$190.00	\$38.00
12/9/15	DLA	Review notes from trial and consider arguments to include in closing argument. Draft Venn diagram comparing the various estimators. Interoffice conference with Attorney Schroeder to discuss same.	2.20	\$90.00	\$198.00
12/9/15	DLA	Prepare PowerPoint presentation for Attorney Schroeder to use during closing argument. Interoffice conference with Attorney Schroeder to review and discuss. Revise presentation to include Attorney Schroeder's edits.	1.80	\$90.00	\$162.00
12/10/15	MDC	Interoffice conference with Attorney Schroeder concerning strategy for day four of trial and research needed for attorney fee petition.	0.40	\$190.00	\$76.00
12/16/15	MES	Interoffice conference with Attorney Merchant to discuss arguments for inclusion in attorney fee motion and terms of possible settlement offer to Metropolitan.	1.10	\$300.00	\$330.00
12/17/15	MDC	Interoffice conference with Attorney Schroeder to discuss exhibits and strategy for motion for attorney fees.	0.30	\$190.00	\$57.00
12/17/15	CHG	Confer with Attorney Schroeder on judgment and attorney fee motion.	0.25	\$405.00	\$101.25
12/17/15	MBM	Evaluate settlement strategy and receivable ranges. Interoffice conference with Attorney Schroeder to discuss same.	0.70	\$375.00	\$262.50
12/17/15	MES	Review e-mail from Attorney Thenell objecting to plaintiff's proposed form of judgment. Interoffice conference with Attorney Merchant to discuss same. Review trial brief and confirm cases cited in support of pre-judgment interest are still good law. Instruct Legal Assistant Abbott to electronically file plaintiff's proposed form of judgment with the court.	1.10	\$300.00	\$330.00
1/8/16	MDC	Interoffice conference with Attorney Schroeder to discuss strategy for attorney fee motion and response in support of Mrs. Beck's proposed form of judgment.	0.30	\$210.00	\$63.00
1/8/16	MES	Interoffice conference with Attorney Colley to discuss the status of his work on the attorney fee motion.	0.10	\$320.00	\$32.00
1/12/16	MDC	Interoffice conference with Attorney Schroeder to discuss additional arguments for attorney fee motion.	0.40	\$210.00	\$84.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/15/16	MES	Telephone conference with Attorney Farnell to confirm Metropolitan did not accept Mrs. Beck's post-verdict settlement offer and that we still need his assistance with the attorney fee petition.	0.20	\$320.00	\$64.00
1/18/16	MDC	Interoffice conference with Attorney Merchant to discuss additional arguments for attorney fee motion.	0.30	\$210.00	\$63.00
1/26/16	MDC	Interoffice conference with Attorney Merchant concerning arguments to include in support of fee multiplier.	0.20	\$210.00	\$42.00
1/26/16	MDC	Interoffice conference with Attorney Schroeder concerning ability to obtain extension of time to file attorney fee motion. Review relevant case law to confirm same.	0.30	\$210.00	\$63.00
1/26/16	MBM	Continue work on attorney fee motion. Review revised bill for conformance with court rules. Interoffice conference with Attorney Schroeder to discuss same.	0.75	\$400.00	\$300.00
2/8/16	MDC	Interoffice conference with Attorney Schroeder concerning argument and authorities in support of motion for attorney fees.	0.60	\$210.00	\$126.00
2/11/16	MES	Meeting with Attorney Greene to discuss his expert opinion.	1.10	\$320.00	\$352.00
11/26/14	CMW	Confer with Attorney Greenwood regarding need for research to verify procedure under Internal Revenue Code Section 1033 to request an extension of time to purchase replacement property and authorities that would support of Mrs. Beck's anticipated request for an extension and necessary background facts concerning Mrs. Beck's insurance case.	0.50	\$180.00	\$90.00
12/3/14	CMW	Confer with Attorney Greenwood regarding need to obtain extension of time to file request for extension of time to obtain replacement property under IRC Section 1033 and avoid gain on receipt of insurance proceeds from damage to house by fire. Consult relevant legal authorities regarding ability to extend time to obtain replacement property and procedure for request.	2.70	\$180.00	\$486.00
12/3/14	MES	Interoffice conference with Attorney Wong concerning information needed for IRS extension request. Follow-up e-mail to Attorney Wong with list of all of the various scopes needed in support of the extension request concerning the cost to repair or replace Mrs. Beck's home.	1.20	\$290.00	\$348.00
12/3/14	CHG	Confer with Attorney Wong on extension of IRC Section 1033 rebuild period.	0.60	\$395.00	\$237.00
12/4/14	CMW	Finish consultation of relevant legal authorities regarding ability to extend time to obtain replacement property and procedure for request under IRC Section 1033. Summarize conclusions and recommendations in memorandum for Attorney Greenwood. Request 2012 tax return from CPA.	2.60	\$180.00	\$468.00
12/4/14	MES	Review draft explanation for Mrs. Beck's request to the IRS to defer reporting gain under IRC Section 1033 arising from the receipt of a partial payment of fire insurance proceeds received by Mrs. Beck for damage done to her home and anticipated timeline for conclusion of litigation. E-mail to Attorney Wong with suggested edits to same.	0.10	\$290.00	\$29.00
12/5/14	CMW	Confer with Attorney Greenwood regarding drafting of request for extension of time. Receive and briefly analyze 2012 tax returns. Consult relevant tax authorities to obtain address for filing request for extension of time to acquire replacement property under IRC Section 1033.	0.70	\$180.00	\$126.00
12/15/14	MES	Review and revise draft letters to the IRS requesting extension of time for Mrs. Beck to rebuild her home. Interoffice conference with Attorney Wong to discuss suggested edits to same.	0.70	\$290.00	\$203.00
12/18/15	BND	Interoffice conference with Attorney Schroeder regarding status of case and potential timeline for receipt of payment. Revise letter to IRS based on input from Attorney Schroeder.	0.50	\$180.00	\$90.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/18/15	CHG	Telephone conference with Mrs. Beck on status. Follow-up with Attorney Dirks on Section 1033 extension request.	0.35	\$405.00	\$141.75
12/21/15	BND	Interoffice conference with Attorney Greenwood concerning application for extension of replacement period under IRC 1033. Finalize same.	0.30	\$180.00	\$54.00
12/7/15	MDC	Assist Attorney Schroeder with final preparations for trial.	2.10	\$190.00	\$399.00
TOTAL			545.40		\$144,654.00

4. Attached hereto as Exhibit B is a true and accurate copy of my September 1, 2015, email to Plaintiff's counsel with an offer of settlement.

5. Attached hereto as Exhibit C is a true and accurate copy of Plaintiff's September 8, 2015, letter rejecting Defendant's settlement offer.

6. Attached hereto as Exhibit D is a true and accurate copy of Defendant's September 21, 2015, Offer of Judgment which Plaintiff did not accept.

DATED: March 21, 2016, at Portland, Oregon.

s/ Daniel E. Thenell

By: _____
Daniel E. Thenell, OSB No. 971655

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 21, 2016, I served the foregoing
DECLARATION OF DANIEL E. THENELL IN SUPPORT OF DEFENDANT'S RESPONSE
IN OPPOSITION TO PLAINTIFF'S MOTION FOR ATTORNEY FEES AND COSTS on:

Margaret E. Schroeder
Michael B. Merchant
Black Helterline LLP
805 SW Broadway, Suite 1900
Portland, OR 97205

Email: mes@bhlaw.com; dla@bhlaw.com; docketing@bhlaw.com; mbm@bhlaw.com;
tcr@bhlaw.com

Attorneys for Plaintiff

- ☒ by electronic means through the Court's Case Management/Electronic Case Filing system on the date set forth above.
- _____ by mailing a full, true and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to the attorney as shown above, the last-known office address of the attorney, and deposited with the United States Postal Service at Portland, Oregon on the date set forth above.
- _____ by causing a full, true and correct copy thereof to be hand-delivered to the attorney at the attorney's last-known office address listed above on the date set forth above.

THENELL LAW GROUP, P.C.

s/ Daniel E. Thenell

By: _____

Daniel E. Thenell, OSB No. 971655

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Kirsten L. Curtis, OSB No. 113638

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Of Attorneys for Defendant Metropolitan Property
and Casualty Insurance Company

Trial Attorney:

Daniel E. Thenell, OSB No. 971655